

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: 00-6009-CIV-DIMITROULEAS

MAGISTRATE JUDGE SORRENTINO

ROSS JAY LAWSON, _____/
(Plaintiff)

VS.

KEN JENNE, WILLIAM
HITCHCOCK, BROWARD
COUNTY DEPARTMENT OF
CORRECTIONS AND REHAB.,/
(Defendant)

PLAINTIFF, ROSS JAY LAWSON'S RESPONSE TO
DEFENDANT JENNE, HITCHCOCK, AND BROWARD
COUNTY'S MOTION FOR SUMMARY JUDGEMENT
AND INCORPORATED MEMORANDUM OF LAW


FILED BY _____
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CLERK OF DISTRICT
CLERK OF DISTRICT
S.D. OF FL - MIAMI
D.C.

Comes Now the Plaintiff, ROSS JAY LAWSON pro,se and responds to the Defendant's Motion For Summary Judgement And Incorporated Memorandum Of Law, and requests this Honorable Court to enter an Order denying the Defendant's Motion For Summary Judgement. Grounds for this Plaintiff's request are as follows:

PLAINTIFF'S RESPONSE TO DEFENDANT'S SECTION TITLED
INTRODUCTION

The Defendants in their section INTRODUCTION state;

This is a 42 U.S.C. §1983 action for an alleged violation of Plaintiff's First Amendment Right to receive publications through the United States Mail as a pre-trial detainee in Broward County's Main Jail. Plaintiff alleges that Defendants, without justification, violated his First Amendment Right by not permitting him to receive publications through the United States Mail during his incarceration at the jail. Plaintiff further alleges that he has been punished for filing grievances on his alleged First Amendment violations by: (1) being denied access to the jail's law library; (2) being placed in a high custody cell; and (3) having his legal documents confiscated and destroyed. Plaintiff further alleges that Defendants do not apply the ban on publications equally to all housed at the jail.



Although the Defendants are true/partially accurate in some of their facts contained in their section titled INTRODUCTION, they do not, however, cover/show the entire picture. Therefore the Plaintiff states the following in regards to the Defendant's section titled INTRODUCTION:

This is a 42 U.S.C. §1983 action. But not only for violations of the Plaintiff's 1ST amendment rights by the Defendants named in this action, but also for violations of the Plaintiff's 5TH and 14TH amendment rights by the Defendants named in this action. Not only does the Plaintiff claim that he was denied publications through the UNITED STATES MAIL as a pretrial detainee, but the Plaintiff also claims that he was denied publications of any type from being dropped off/delivered to him from any outside source. Such outside sources include but not limited to, Publishers, Newspapers, Colleges, Universities, Family, Technical Training Centers, Law Centers, Libraries, Book Stores, Government, Religious Sources, etc. etc. It is true that the Plaintiff was and still is a pretrial detainee awaiting trial, and has not been convicted, and does still fall under Due Process and not Cruel And Unusual Punishment. As this Honorable Court is well aware, Due Process of course prohibits any type of punishment prior to conviction, not merely Cruel And Unusual Punishment. Plaintiff as well, does, claim that the Defendants named in this action were without justification in instituting or upholding the policy that bans publications of any type from coming into the Jail for inmates. And that the Plaintiff's rights were violated when the Defendants named in this action would not change the policy, or allow the Plaintiff to receive publications through the UNITED STATES MAIL or dropped off/delivered to the Plaintiff by any outside source. The Plaintiff further claims that he was punished and acts of reprisal were committed against him, not only for filing Requests and Grievances that explained that his CONSTITUTIONAL & CIVIL RIGHTS were being violated, but that the Plaintiff was also punished and acts of reprisal committed against him for attempting to have copies made of the original copy of this action, so as he could file such to the Federal Courts and initiate this action that is now pending before this Honorable Court. Some of the punishment/acts of reprisal by the Defendants named in this action, in which the Plaintiff was forced to endure are, but are not limited to: (1) being placed in a high custody level cell; and (2) being denied access to the jail's law library; and (3) having legal documents confiscated and destroyed. The Plaintiff has/does further allege that Defendants did not apply the ban on publications equally to all housed at the jail from the period of time that the ban on publications was enacted or the date of the Plaintiff's incarceration (7/17/97), until S.O.P. 5.4.1. (J) (1) was enacted on 3/5/99, which allowed the following: Books, magazines, and newspapers for inmates will not be accepted through the mail. The only exception is: religious publications (soft cover) may be ordered directly from the publisher or provided by outside religious groups.

PLAINTIFF'S RESPONSE TO THE DEFENDANT'S
CONCISE STATEMENT OF MATERIAL FACTS

Defendants claim; 1. On March 20, 1997, the Broward Sheriff's Office revised its Standard Operating Procedure (SOP) 5.4.1 entitled Inmate Mail Procedures.¹

Plaintiff's response to (1), The Plaintiff agrees that the Broward Sheriff's Office revised its Standard Operating Procedure (S.O.P.) 5.4.1. entitled Inmate Mail Procedure, on March 20, 1997.

Defendants claim; 2. SOP 5.4.1 J.1 states that "Books, magazines, and newspapers for inmates will not be accepted through the mail."²

Plaintiff's response to (2), The Plaintiff agrees that S.O.P. 5.4.1. (J),(1) states that "Books, magazines, and newspapers for inmates will not be accepted through the mail."

Defendants claim; 3. This SOP, as well as all the others, are applied equally to everyone housed at the jail whether their status is that of an inmate or a pre-trial detainee.³

Plaintiff's response to (3), The Plaintiff disagrees! And claims the following in opposition;

The Plaintiff ROSS JAY LAWSON was arrested on 7/17/97, and booked into the Broward County Jail on the same day. The ban on publications was in affect and upheld by the Defendants at that time. This is verified by S.O.P. 5.4.1 (INMATE MAIL PROCEDURE) dated 3/20/97 section (J) Publications, and such section read as follows, "Books, magazines, and newspapers for inmates will not be accepted through the mail." Although it was the policy to ban/prohibit all publications from entering the jail in any fashion, the Defendants allowed Christian materials, Christian Correspondence Courses, and all types of Christian publications, to be admitted to the jail and inmates in several fashions. Such fashions were as follows, U.S. MAIL, Christian visitors hand delivering them, and dropped off at the jail for inmates. This Christian material/publications was the Defendant's only exception to the rule banning all publications, and this exception was an un-written law that was upheld by the Defendants named in this action. Then on

3/5/99 the Defendants revised the S.O.P. section 5.4.1. (J) Publications: which then allowed and read as follows, "Books, magazines, and newspapers for inmates will not be accepted through the mail. The only exception is: religious publications (soft covered) may be ordered directly from the publisher or provided by outside religious groups."

Therefore the Defendants allowed one religious group/type of inmates to receive religious publications, while denying all other types the same. This went on from 7/17/97 until 3/5/99. And by the Defendants instituting S.O.P. 5.4.1 dated 3/5/99 they show that they knew the well established law concerning publications and inmates rights to such. The inmate affidavits that are incorporated in this response to Defendants request for summary judgement shall prove beyond a doubt that the Defendants in this action did in fact apply the ban on publications unequally to inmates of their choosing housed in the Broward County Jail. It should also be noted that the Plaintiff in this action is Jewish by birth, and not Christian, and therefore the Christian publications that were allowed in to the jail from 7/17/97 until 3/5/99 were of no use or desire to the Plaintiff in this action.

Defendants claim; 4. The purpose of SOP 5.4.1 is to maintain order and security within the jail.⁴

Plaintiff's response to (4), The Plaintiff disagrees! And Claims the following in opposition;

The Plaintiff claims that the purpose of S.O.P. 5.4.1. was not to maintain order and security within the jail. But that S.O.P. 5.4.1. entitled "INMATE MAIL, ACCESS TO PUBLICATIONS AND INSPECTION OF LETTERS AND PACKAGES" was revised and put into effect by Sheriff Ron Cochran & SUSAN W. McCampbell on August 23, 1996. And that S.O.P. 5.4.1. was enacted to ban all publications from the Broward County Department Of Corrections and Rehabilitation in order to cut costs, and save money, while at the same time prohibit all inmates, convicted, non-convicted, sentenced, or non-sentenced, from exercising their First Amendment Rights to receive publications of their choice, practice and study religion of their choice, and learn subjects of their choice, through receiving publications of their choosing. The Plaintiff also claims that it was no coincidence that 42 USCS §1997e. "Suits by prisoners" was enacted only months prior to Cochran & Campbell revising and putting into effect S.O.P. 5.4.1. not to mention that Chapter 33 governing county jails was abolished in the end of 1996 and county jails only had to develop a minimum of the Florida Model Jail Standards. With these two main laws/factors in play Cochran & Campbell were under the assumption that they could deny inmates their First Amendment Rights by revising S.O.P. 5.4.1. and save them both time and money as well. The Defendants named in

this action enforced and upheld S.O.P. 5.4.1. even when it was brought to their attention that S.O.P. 5.4.1. violated the Plaintiff's in this action rights. The Defendants in this action refused to change such policy. Showing that the Defendants in this action totally disregarded the Plaintiff's Rights. This done after numerous requests, grievances, and letters, informing the Defendants that S.O.P. 5.4.1. violates the Plaintiff's Rights. To further the Plaintiff's position on this issue Defendant Hitchcock claims in his affidavit that, and I quote, " S.O.P.5.4.1. is also in place to ensure order within the jail whereas if inmates were permitted to receive these materials, deputies would be required to search and inspect each item entering the jail. This would encompass an inordinate amount of time and preclude the deputies from focusing on the inmate population of the jail". This shows that time and money are one of the main factors in Defendant Hitchcock's reasons for upholding a ban on publications that violates the Plaintiff's First Amendment Rights.

Defendants claim; 5. Plaintiff has been in custody at the Broward County Main Jail since July 18, 1997. (support)

Plaintiff's response to (5), The Plaintiff states that he was booked into the Broward County Main Jail on July 17, 1997, not July 18, 1997.

Defendants claim; 6. Currently, Plaintiff has approximately 35 charges against him which are pending trial. Until said charges are determined, Plaintiff will remain at the jail as a pre-trial detainee. (support)

Plaintiff's response to (6), The Plaintiff agrees that he has numerous charges against him, and that he will remain at the jail as he is now, as a pretrial detainee, non-convicted, awaiting trial.

Defendants claim; 7. On or about October 28, 1997, Plaintiff made his first inquiry as to how he was to go about receiving books and/or magazines through the mail.³

Plaintiff's response to (7), The Plaintiff states that he made his first inquiry as to how he was to go about receiving publications within the first couple of weeks from the date he arrived at B.C.M.J. 7/17/97.

Defendants claim; 8. In November 1997, Plaintiff received a response informing him that

books and magazines from the publisher were not permitted into the jail and that is why his request was denied.⁶

Plaintiff's response to (8), The Plaintiff agrees that in November 1997, the Plaintiff received a response informing him that books and magazines were not permitted into the jail and that is why his request was denied.

Defendants claim; 9. On November 20, 1998, Plaintiff requested a copy of the rules which govern the receipt of religious materials through the mail.⁷

Plaintiff's response to (9), Plaintiff filed two requests on November 20, 1998, one was to the Mail Room & the other was to the Chaplain these two requests are Plaintiff's Summary Exhibit #13 & #14.

Defendants claim; 10. On November 23, 1998, Superintendent William Hitchcock responded to Plaintiff's request via memorandum and provided him a copy of the revision to SOP 5.4.1. Hitchcock further informed Plaintiff that the remaining SOP's were available to him in the law library.⁸

Plaintiff's response to (10), The Plaintiff agrees that on November 23, 1998 Superintendent William Hitchcock responded to one of the Plaintiff's requests on the subject of publications. Defendant Hitchcock's response is Plaintiff's Summary Exhibit #16.

Defendants claim; 11. Plaintiff has been permitted to receive religious publications through the mail while a pre-trial detainee at the Broward County Main Jail.⁹

Plaintiff's response to (11), See Plaintiff's response to (3), the Plaintiff from 7/17/97 until 3/5/99 was not allowed to receive religious publications through the mail.

Defendants claim; 12. On April 11, 1998, while Plaintiff was in his cell, he was observed setting a fire while in possession of an unauthorized material.¹⁰ Plaintiff was disciplined for said incident by receiving three (3) days in lockdown.^{11, 12}

Plaintiff's response to (12), the incident that took place on April 11, 1998 has no bearing on this action. This is do to the fact that the classification points that were assessed for this incident were removed after 90 days by classification. Inmates classification points are increased by 4 points when given a D.R. and every 90 days 7 points are deducted from all inmates classification points upon being reviewed. The Plaintiff will present this evidence/impeachment material during trial, thus showing that the incident that was alleged to have taken place on April 11, 1998 has no bearing on this action, nor the Plaintiff's claims.

Defendants claim; 13. On August 8, 1998, Plaintiff was relocated to the 8th floor of the jail due to violent acts.¹³

Plaintiff's response to (13), Plaintiff admits that on August 8, 1998 he was relocated to the 8th floor for a D.R. But on August 11, 1998 the Plaintiff was released from the 8th floor to to the D.R. he was given being dismissed by a Deputy that personally witnessed the incident, and testified to the Plaintiff's innocents. This incident has no bearing on the Plaintiff's allegations in this action.

Defendants claim; 14. On February 16, 1999, Plaintiff was relocated to the 8th floor of the jail due to violent/disruptive behavior.¹⁴

Plaintiff's response to (14), The Plaintiff denies that on February 16, 1999 Plaintiff was relocated to the 8th floor of the jail due to violent/disruptive behavior.

Defendants claim; 15. On October 5, 1999, while Plaintiff was in his cell, he was observed

trying to cook some food while in possession of an unauthorized object (metal stinger).¹⁵ Plaintiff was disciplined for said incident by receiving thirty (30) days in lockdown. (support)

Plaintiff's response to (15), Plaintiff agrees with Defendant claim (15.) and states that he was placed in a non-violent lockdown for 28 days.

Defendants claim; 16. On November 23, 1999, Deputy Wilcox obtained a file from Plaintiff containing grievances, inmate request forms and commissary ledgers.¹⁶

Plaintiff's response to (16), The Plaintiff denies that on November 23, 1999 Deputy Wilcox obtained a file from Plaintiff containing grievances, inmate request forms and commissary ledgers. The Plaintiff states that on November 11, 1999 Deputy Wilcox received a file folder containing a law suit (this action), grievances, request forms, letters & legal work on Plaintiff's criminal cases, etc.

Defendants claim; 17. Said file was obtained to investigate an alteration on the commissary ledgers.¹⁷

Plaintiff's response to (17), The Plaintiff denies that said file was obtained to investigate an alteration on the commissary ledgers. The Plaintiff states that the file obtained by Deputy Wilcox from the Plaintiff on November 11, 1999, was obtained in order for Deputy Wilcox to make copies for the Plaintiff and return such same day.

Defendants claim; 18. After said investigation, Deputy McManus returned the file to Plaintiff the same way it was received.¹⁸

Plaintiff's response to (18), Plaintiff denies Defendant's (18.) claim. The Plaintiff states that on or about November 23, 1999 Deputy McManus returned the file that the Plaintiff had given to Deputy Wilcox to make

(9)
copies for him. But said file that was returned to Plaintiff by Deputy McManus was missing law suit (this action), letters and legal work (defendant's criminal cases), grievances, requests, letters, etc. And that Plaintiff in this action informed Deputy McManus of such.

Defendants claim; 19. As of June 8, 1998, Plaintiff's access to the law library has been as follows:

Monday from 7:30 am-11:45 am
Tuesday from 7:30 am-11:45 am and 12:30 pm-2:30 pm
Wednesday from 12:30 pm-2:30 pm
Thursday from 7:30 am-11:45 am and 12:30 pm-2:30 pm

for a total of approximately 18 hours per week.^{19, 20}

Plaintiff's response to (19), The Plaintiff denies Defendant's (19.) claim. The Plaintiff states that on January 23, 1998 the Honorable Judge SUSAN LEBOW signed an Order recommending that the Plaintiff in this action be given a minimum of 17 hours per week in the jails law library. Judge LEBOW'S Order was followed by the jail and it's staff untill on or about 6/99. At that time the Plaintiff received a inmate correspondence from Defendant HITCHCOCK dated July 2, 1999, said correspondence granted the Plaintiff in this action once again 17 hours per week in the jail's law library, and was addressed to both acting Lieutenants W. McPherson & Bechard compelling them to ensure that the Plaintiff in this action receive 17 hours access per week law library time as Ordered by the Honorable Judge LEBOW. The Plaintiff then got 17 hours access to the law library untill jail Deputies learned of this action the Plaintiff was planning to file naming Defendant Hitchcock as a Def. Then on November 24, 1999 (the next day that Plaintiff had file returned missing pleadings from this action, etc.) The Plaintiff received a inmate correspondence from Defendant Hitchcock, informing the Plaintiff that the matter of law library would be sent to their legal department and that the Plaintiff in this action would receive a response on Dec. 3, 1999. On or about Dec. 3, 1999 the Plaintiff received a response dated Dec. 3, 1999, and such response came from Defendant Hitchcock denying Plaintiff law library time.

**CONCISE STATEMENT OF MATERIAL FACTS, IN CHRONOLOGICAL ORDER,
CONCERNING THE PLAINTIFF BEING PLACED IN A HIGH CUSTODY CELL,
BEING DENIED ACCESS TO THE JAIL'S LAW LIBRARY, AND HAVING
LEGAL DOCUMENTS CONFISCATED AND DESTROYED.**

1. Plaintiff has been in custody in the Broward County Jail as a pretrial detainee since July 17, 1997.
2. Upon the Plaintiff entering the Broward County Jail on July 17, 1997 the Broward County Department Of Corrections and Reh. had a ban on publications that was in effect and enforced and read as follows: 3/20/97 S.O.P. 5.4.1. (J)(1) Books, magazines, and news papers for inmates will not be accepted through the mail.
3. S.O.P. 5.4.1. (J)(1) dated 3/20/97 was enforced on all publication other then Christian religious publications which were allowed to be admitted both by mail and dropped of for inmates that wanted such. It should be noted that the Plaintiff in this action is Jewish by birth not Christian. And Jewish publications were denied at that time.
4. In October of 1997 the Plaintiff in this action received a REJECTED MAIL NOTIFICATION from the BROWARD SHERIFF'S OFFICE DEPARTMENT OF CORRECTIONS AND REHABILITATION for a U.A. BOOK (Non-Religious) in which the rejected mail notification informed the Plaintiff that his book (non-religious) was returned to sender. Other REJECTED MAIL NOTIFICATIONS were received by the Plaintiff on 10/29/????, and 9/10/99, denying Plaintiff other publications as well.
5. From 10/25/97 until 11/25/99 the Plaintiff in this action filed 12 requests, 6 grievances, and several letters concerning publications and receiving such at the Broward County Jail, all of which were denied. There were other requests, grievances, and letters written as well that were taken by Deputy Wilcox and never returned to the Plaintiff in this action, and those are not included in this number.

1.) See Plaintiff's Summary Exhibit #1 (Jail's Computer Booking Printout)

2.) See Plaintiff's Summary Exhibit #2 (S.O.P. Dated 3/20/97)

3.) See Plaintiff's Summary Exhibit #3 (See attached affidavits)

4.) See Plaintiff's Summary Exhibit #4 (See attached REJECTED MAIL NOTIFICAT)

5.) See Plaintiff's Summary Exhibit #5-23 (Grievances, Requests, Letters, Etc)

6. On January 23, 1998 the Honorable Judge Susan Lebow signed an Order granting the Plaintiff in this action 17 hours per week access to the law library in the Broward County Jail. Shortly after the Plaintiff in this action received a Law Library Schedule giving/granting the Plaintiff 18 hours per week access to the jail's law library.
7. The schedule was followed by the jail and the Plaintiff took every opportunity he was given to attend the law library untill approx. June of 1999 the Plaintiff was denied the scheduled access to the law library that he was granted for 18 hours, this due to shifts and personel changing positions in the jail.
8. Because of the changes in positions in the jail, and the Plaintiff in this action not getting his 17 hours per week in the law library as Court Ordered, the Plaintiff on 6/24/99 sent a letter to Sgt. ADAMS and Deputy Wilcox, with copies to Director PATRICK TIGHE, and one of the Defendants in this action Superintendent/Captain WILLIAM HITCHCOCK, and the Plaintiff in such letter requested to have his Court Order and law library schedule honored so as the Plaintiff would have access of 17 hours per week in the jail's law library.
9. On July 2, 1999 one of the Defendants in this action Superindenent/Captain WILLIAM HITCHCOCK responded to the letter written by the Plaintiff dated 6/24/99. In WILLIAM HITCHCOCKS response titled INMATE CORRESPONDENCE dated July 2, 1999 HITCHCOK stated:

The Subject inmate has a Court Order (see attached) that grants him access to the Law Library on a 17 hour a week basis. He currently has a total of 46 charges against him according to the Classification Staff who researched his files. Only a very few have been concluded in any form. See that Inmate Lawson receives the weekly 17 hour Law Library access as ordered by Judge Lebow on January 23, 1998. If you have time constraints you can not deal with, work with the Charlie shift to get him more access. Let me know if there are any other problems.

CC: Inmate Ross Lawson, 7-C-3
File

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- (6.) See Plaintiff's Summary Exhibit #24 (Court Order Granting Law Library time)
 - (6.) See Plaintiff's Summary Exhibit #25 (B.C.M.J.'s law library schedule)
 - (7.) See Plaintiff's Summary Exhibit #26 (See Plaintiff's Affidavit)
 - (8.) See Plaintiff's Summary Exhibit #27 (See Letter to Sgt. ADAMS & WILCOX)
 - (9.) See Plaintiff's Summary Exhibit #28 (See Def. HITCHCOCK'S Inm. CORRESP.)

10. The Plaintiff in this action was then given his 17 hours access to the Broward County Jail's law library every week. The Inmate Correspondence written by Defendant HITCHCOCK was complied with even if some of the 17 hours per week needed to be made up by taking the Plaintiff to the law library on Charlie shift because Bravo shift did not have all the hours open to allow the Plaintiff to attend the law library on Bravo shift. This went on until 10/5/99.
11. On 10/5/99 the Plaintiff in this action was given a D.R. for non-violent violations of the jail's rules and regulations.
12. On 10/5/99 after getting a D.R. for non-violent violations of the jail's rules and regulations the Plaintiff was then moved to non-violent lockdown unit 7/B/209 which housed inmates for non-violent D.R.s where as inmates that get D.R.s for violent rule violations go to the 8th floor lockdown (one man per room) lockdown.
13. The Deputy's that wrote the D.R. promised the Plaintiff in this action that he would not receive more than 15 days in lockdown for the D.R. that the Plaintiff received on 10/5/99, but the Plaintiff in fact did get 30 days lockdown and served 28 of those thirty days in non-violent lockdown, getting out two days early for completing extra duty.
14. On 11/4/99 the Plaintiff was released two days early from his 30 day lockdown sentence and moved/transferred to 6/C/1-6-2, 6/C/1 is a lower custody level floor than the 7th floor, Plaintiff was moved to 6/C/1 due to classification's 45 day review and finding the Plaintiff at max custody level, not closed custody level, but max custody level as Plaintiff was assessed at 29 points.

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- (10.) See Plaintiff's Summary Exhibit #29 (See Comp. Print. Inm. Movement)
 - (11.) See Plaintiff's Summary Exhibit #30 (See Inmate Posting Sheet)
 - (11.) See Plaintiff's Summary Exhibit #31 (See Inmate Relocation Request Form)
 - (12.) See Plaintiff's Summary Exhibit #30 (See Inmate Posting Sheet)
 - (12.) See Plaintiff's Summary Exhibit #31 (See Inmate Relocation Request Form)
 - (12.) See Plaintiff's Summary Exhibit #26 (See Plaintiff's & Inmates affidavits)
 - (13.) See Plaintiff's Summary Exhibit #32 (See Detainee Contact Card 10/5/99)
 - (14.) See Plaintiff's Summary Exhibit #32 (See Detainee Contact Card 11/4/99)
 - (14.) See Plaintiff's Summary Exhibit #33 (See Inmate Relocation Request Form)

15. Prior to entering unit 6/C/1 Deputies searched the Plaintiff's property. Upon the Deputies searching Plaintiff's property, the Deputies found the original hand written/ruff draft of this action. Deputies made comments to the fact that Mr. Hitchcock (one of Defendants in ruff draft) will be told of the matter. And that even the Courts can't tell the jail what to do, officers run the jail, not the Courts!
16. Upon the Plaintiff being housed in unit 6/C/1, he was harassed by staff/ Deputies about the amount of legal work, and documents pertaining to legal matters. Do to this the Plaintiff contacted his family, and in turn the Plaintiff's family contacted the Broward County Jail's Classification department. The Classification Department then agreed/promised the Plaintiff's family that they were going to relocate the Plaintiff to a cell that he had previously was housed in so as his adjustment to inmate open population would be as smooth as possible, and so that he the Plaintiff would not be harassed any more concerning his legal work or issues surrounding such.
17. On 11/6/99 the Plaintiff in this action was relocated to his previous cell 7/C/3-9-1 per Classification. This done after a complete review was conducted on the Plaintiff and his Classification file.
18. On 11/6/99 after the Plaintiff had settled in to unit 7/C/3 with no problems, the shifts changed and do to acts of reprisal for no reason or truthful justification the Plaintiff was moved to the most secure/high risk/lockdown unit in the jail, unit 8/C/2-04.

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- (15.) See Plaintiff's Summary Exhibit #26 (See Plaintiff's Affidavit)
- (16.) See Plaintiff's Summary Exhibit #26 (See Plaintiff's Affidavit)
- (16.) See Plaintiff's Summary Exhibit #34 (See Plaintiff's Family's Affidavit)
- (17.) See Plaintiff's Summary Exhibit #35 (See Inmate Posting Sheet)
- (17.) See Plaintiff's Summary Exhibit #36 (See Classification Review Form)
- (17.) See Plaintiff's Summary Exhibit #37 (See Inn. Relocation Request Form)
- (18.) See Plaintiff's Summary Exhibit #32 (See Detainee Contact Card)
- (18.) See Plaintiff's Summary Exhibit #26 (See Plaintiff's Affidavit)

19. Unit 8/C/2-04 does not allow inmates housed in it's unit to have access to the jail's law library, nor any movement unless chained and shackled and handcuffed to any where that inmate must go, such as Court and Medical etc. the 8th floor is the highest custody level floor in the Broward County's Jail System, and houses only the most violent dangerous inmates who violate the jail's rules and regulations with violent rule violations.
20. It should also be noted that the Broward County Main Jail's law library does not have a paralegal to assist or help inmates in any way, nor does it have an employee to do so.
21. On 11/6/99 upon the Plaintiff being placed in unit 8/C/2 the Plaintiff discovered that he would be denied access to the jail's law library and so forth. So the Plaintiff submitted a request to have access to the law library as designated by the Defendant Superintendent/Captain William Hitchcock on July 2, 1999. The request that the Plaintiff submitted was dated 11/8/99
22. Also on 11/8/99 the Plaintiff submitted a request asking for copies to be made.
23. On 11/10/99 again the Plaintiff submitted a request form begging to allow him access to the jail's law library so he could make copies, research, etc, etc,.
24. On 11/11/99 early in the morning the Plaintiff once again requested to have copies made.

(19.) See Plaintiff's Summary Exhibit #38 (S.O.P. 7.30-Adm.Segregation)

(19.) See Plaintiff's Summary Exhibit #26,3 (Plaintiff's & Other Affidavits)

(20.) See Plaintiff's Summary Exhibit #26,3 (Plaintiff's & Other Affidavits)

(21.) See Plaintiff's Summary Exhibit #38 (See Request Form 11/8/99)

(22.) See Plaintiff's Summary Exhibit #39 (See Request Form 11/8/99)

(23.) See Plaintiff's Summary Exhibit #40 (See Request Form 11/10/99)

(24.) See Plaintiff's Summary Exhibit #41 (See Request Form 11/11/99)

25. On 11/11/99, later in the day, Deputy Wilcox came to the 8th Floor and took papers from the Plaintiff and inmate PERRY ARCHIBALD 50999349, to have copies made for them. The Plaintiff's paperwork contained a hand written copy of the pleadings in this action, grievances, requests, and letters & legal work that was to go to the Plaintiff's attorney. All documents taken by Deputy Wilcox were promised to be copied and returned with the mail later that day.
26. On 11/11/99 later during Charlie Shift, during when mail was being handed out, inmate PERRY ARCHIBALD 50999349 received all his papers with copies made. Plaintiff asked the Deputy about the papers that belonged to him and that his should be in the mail as well, but the Deputy told the Plaintiff that there was nothing in the mail for him.
27. The Plaintiff immediately contacted his family, and in a short period of time, learned, that his papers were confiscated and in Defendant Superintendent/Captain William Hitchcock's possession. It should be noted that William Hitchcock was listed as a Defendant in the hand written copy of the pleadings that the Plaintiff requested to have copies made of by Deputy Wilcox, that were now in William Hitchcock's possession.
28. On 11/12/99 the Plaintiff submitted a grievance on the fact that he was being denied access to the law library, and that it was all do to acts of reprisal for attempting to file suit for violations of the Plaintiff's rights against the Defendants.
29. On 11/18/99 the Plaintiff submitted a request to Deputy Wilcox asking where and why he has not had his legal papers returned to him, so forth etc.
30. On 11/19/99 the Plaintiff submitted a request to Defendant Superintendent/Captain William Hitchcock asking why that he had the Plaintiff's legal work and papers, and requesting them to be returned A.S.A.P.

(25.) See Plaintiff's Summary Exhibit #42 (See Inmates signed statement)

(25.) See Plaintiff's Summary Exhibit #26,3 (Plaintiff's & Other Affidavits)

(26.) See Plaintiff's Summary Exhibit #26.3 (Plaintiff's & Other Affidavits)

(27.) See Plaintiff's Summary Exhibit #26,34 (Plaintiff's & Family Affidavit)

(28.) See Plaintiff's Summary Exhibit #43 (See Grievance Form 11/12/99)

(29.) See Plaintiff's Summary Exhibit #44 (See Request Form 11/18/99)

(30.) See Plaintiff's Summary Exhibit #45 (See Request Form 11/19/99)

31. Then finally on 11/23/99 the Plaintiff received a INMATE CORRESPONDENCE from Deputy J. McManus, Report Coordinator, Administrative Aid to Captain Hitchcock. The Subject of this letter was the file that Deputy Wilcox had taken from the Plaintiff on 11/11/99. The Correspondence read as follows:

The file Dep. Wilcox had taken from you contained Grievances, Inmate Request Forms, Commissary Ledgers. One of the Commissary Ledgers was altered. We noticed that on September 10, 1999 there was a deposit of \$165 put into your account. On the same day it was disbursed back out. From talking with your family member on November 22, 1999, you received money for a claim for some lost property. Why you would change this ledger we do not know. I will turn the file back to you today, the way we received it.

32. When the Plaintiff received his file back it had the following missing, handwritten pleadings on this action, requests, grievances, letters & papers to Plaintiff's attorney .

33. Then on 11/24/99 the Plaintiff received a INMATE CORRESPONDENCE from the Defendant in this action Superintendent/Captain William Hitchcock, on the subject of access to law library. And that correspondence read as follows:

Your complaint about access to the Law Library was sent to our Legal Department. They have informed me that they would provide an answer on December 3, 1999.

34. On 11/24/99 the Plaintiff submitted a grievance on the fact that the file that was returned to the Plaintiff that belonged to the Plaintiff was missing criminal paperwork, letters to attorney, questions, etc. and to please have them returned.

(31.) See Plaintiff's Summary Exhibit #46 (See Inmate Correspondence 11/23/99

(32.) See Plaintiff's Summary Exhibit #26,3 (Plaintiff's, Other Affidavits)

(33.) See Plaintiff's Summary Exhibit #47 (See Inmate Correspondence 11/24/99

(34.) See Plaintiff's Summary Exhibit #48 (See Grievance Form 11/24/99)

35. Then on December 3, 1999 the Plaintiff in this action received a INMATE CORRESPONDENCE from the Defendant in this action Superintendent/Captain William Hitchcock, on the subject of law library, and such read as follows:

I have consulted with our legal division regarding your court order requesting additional Law Library time. E. Williams, P.A. verified that the court order states that we are 'requested' to allow you to attend the Law Library 'according to our policy and procedures'. Our policy is to schedule law library time for the entire population on an equal basis with the exception of inmates who are pro se (who have no assigned attorney of record).

We feel that inmates who are pro se, obviously require additional law library time. We also feel that inmates who have attorneys of record are provided ample scheduled time for their legal needs. Any further infringement on the Law Library schedule would lessen the time for other regularly scheduled inmates and valid pro se cases. As you have an attorney of record and are not pro se, we are no longer inclined to provide you with any additional Law Library time.

You also asked why you could not have more than 20 copies of a particular set of documents. Our long standing rule, which was promulgated years ago according to F.S.S. 33-8 detention facility codes (see attached), limited copies to the number fifteen. We feel that 20 copies are a proper number of copies to allow for total access to the courts and all other entities that would require a copy. If you deem you still require more copies, I request a written list of all entities that you feel require a copy for your purposes. The copies will be allowed if the list is followed with proper justification for need of copies being made for those areas.

36. Then on 12/15/99 the Plaintiff submitted a grievance on the fact that the Plaintiff's grievance he filed on 11/24/99 was never reponded to, and that the Plaintiff was still missing criminal paperwork, letters, noted discovery, pleadings in this action, etc. And the response that the Plaintiff received was that " Deputy Wilcox stated she had taken the file gave it to Captain Hitchcock, then I returned it to you." Signed by Deputy J. McManus.

(35.) See Plaintiff's Summary Exhibit #49 (See Inmate Correspondence 12/3/99)

(36.) See Plaintiff's Summary Exhibit #50 (See Inmate Grievance 12/15/99)

37. On 11/25/99 after the Plaintiff's family getting involved in the fact that the Plaintiff was housed on the 8th floor, and having outside intervention involved, the Plaintiff was transferred to unit 7/D/2-6-1-
38. Then on 12/17/99 while the Plaintiff was then housed in open population unit (7/C/2), the Plaintiff submitted a request to the law library requesting for the law library to place him on the list for all available times. The response that the Plaintiff received was as follows. "I was told you cannot come down with court orders."
39. Then in January 2000 the Plaintiff once again was able to redo the pleadings in this action, and filed such with the U.S.DISTRICT COURT, and such was received on 1/4/00.

(37.) See Plaintiff's Summary Exhibit #51 (See I.S.M.A.S.R.F.)

(37.) See Plaintiff's Summary Exhibit #26,34 (Plaintiff & Family Affidavits)

(38.) See Plaintiff's Summary Exhibit #52 (See Request Form 12/17/99)

(39.) See Plaintiff's Summary Exhibit #53 (See CIVIL DOCKET CASE# 00-CV-6009)

MATERIAL FACTS IN DISPUTE

Wherefore the Plaintiff has shown that there are material facts in dispute. And such require a trial by jury. The Plaintiff in this action has verified that material issues and facts are in dispute by documents, affidavits, etc. that are attached and incorporated into this response to Defendant's Motion For Summary Judgement, and such are listed as Plaintiff's Summary Exhibits.

MEMORANDUM OF LAW

I. The Plaintiff has a First Amendment right to receive publications through the mail from publisher's, bookstores, and distributors, a right which the Defendant's have violated.

A. Applicable Law

The Supreme Court cases addressing inmate's rights to receive publications through the mail, Bell v. Wolfish, 441 U.S. 520 (1979) and Thornburgh v. Abbott, 490 U.S. 401 (1989), both contemplate the First Amendment right of prisoner's (convicted and pretrial detainee) to receive publications through the mail, subject to reasonable penological interests. The Court stated in Bell that "our cases have held that sentenced prisoner's enjoy freedom of speech and religion under the First and Fourteenth Amendments" Bell at 545. Analyzing the restriction imposed upon pretrial detainee's in that case—one which limited inmates to receiving hardbound books from publisher's only—the Court in finding that restriction reasonable, looked at three (3) factors: 1) Whether there was evidence that the jail officials had exaggerated their response to the legitimate security problem; 2) Whether the regulation operated in a neutral fashion; and 3) Whether there were alternative means of obtaining reading material that have not been shown to be burdensome or insufficient. Bell at 551. The Court found that 1) The jail officials had not exaggerated their response to the security problem; 2) That the rule was content-neutral; and 3) That alternative means of obtaining reading material in the jail did exist, and were not burdensome or insufficient. The Court noted that the alternative means of obtaining reading material included: 1) The availability of softcover publications through the mail from publisher's and bookstores; 2) A "relatively large" reading library consisting of 3000 hardbacks, 5000 paperbacks, and collections of donated books in the various housing units. Bell at 552. The Court also underscored the fact that inmates in that detention center were only housed for sixty (60) days or less. Since the detention center allowed its inmates to obtain softcover books and magazines through the mail from publisher's and bookstores, and provided them with a large reading library, the Court found no evidence of any "exaggerated response". Similarly, in Thornburgh v. Abbott, The Supreme Court upheld a rule permitting censorship of individual publications where such were found

to be detrimental to the security, good order, or discipline of the institution, but disallowed censorship where publications were banned because of the philosophical, religious, political, sound or sexual content of the publication. Thornburgh at 414-419. In evaluating the prison's publications policy. The Court noted that the inmates possessed sufficient alternative means of obtaining reading materials because the prisons policy permitted "a broad range of publications to be sent, received, and read." Thornburgh at 417-418. The Court also mentioned that "any attempt to achieve greater consistency by broader exclusions might itself run afoul of the second Turner factor (whether there are alternative means of exercising the First Amendment right) Id. at 417, n.15. "Under Thornburgh v. Abbott" wrote a recent federal circuit court, "inmates have a clearly established right to receive publications that are not prohibited by reasonable penological interests". Turner v. Stewart, 188 F.3d 515 (4th Cir. 1999).

In addition, federal circuit and federal district courts interpreting the decisions in Bell and Thornburgh have struck down jail and prison policies that have enacted wholesale bans on books, magazines, or newspapers. Thomas v. Leslie, 176 F.3d 489 (10th Cir. 1999) (ban on newspapers unconstitutional); Jackson v. Elrod, 881 F.2d 441, (7th Cir. 1989) (wholesale ban on hardbound publications violates Bell standards); Martin v. Tyson, 845 F.2d 1451 (7th Cir. 1988) (global ban on newspapers unconstitutional); Green v. Ferrell, 801 F.2d 787 (5th Cir. 1986) (ban on newspaper subscriptions unconstitutional); Pepperling v. Crist, 678 F.2d 787 (9th Cir. 1982) ("blanket prohibition against receipt of publications by any prisoner comes a heavy presumption of unconstitutionality"); Kincaid v. Rusk, 670 F.2d 737 (7th Cir. 1982) ("maintenance of security and discipline do not justify the wholesale prohibition of pictorial magazines, hardbound books, or newspapers"); Parnell v. Waldrip, 511 F.Supp 764 (W.D.N.C. 1981) (ban on receipt of paperback books, magazines and newspapers violates Bell standards). Both Bell and Thornburgh, centerplate the right to receive publications through the mail, subject only to the limitations on the source (publishers and bookstores if hardbound, per Bell) or content (impermissible if detrimental to the security, order, or discipline of the institution, per Thornburgh). As the federal court stated in Brodes v. Seiter, 779 F.2d 1181 (6th Cir. 1985) "we note that other courts of appeal have held that prisoners possess First Amendment rights to receive printed publications by mail order or subscription" Id. at 1181 (internal citations omitted). Further, as the court in Kincaid v. Rusk, 670 F.2d 737 (7th Cir. 1982) held. "pretrial detainees, regardless of the

length of detention, suffer substantial deprivation of their First Amendment rights when access to newspapers, books, and magazines is arbitrarily circumscribed" Id., at 745.

B. Application of the law to the facts

The defendant's have clearly infringed upon the plaintiff's First Amendment rights by enacting and enforcing a wholesale ban on all non-religious publications ordered through the mail. As the foregoing discussion of applicable legal standards in Bell, Thornburgh and their progeny has shown, broad, wholesale ban on publications violate clearly established constitutional First Amendment law in the prison context. The defendant's ban is an "exaggerated response" to the alleged security problem because it prohibits the plaintiff from ordering any non-religious book through the mail--the sort of over exclusive prohibition which Bell and Thornburgh considered to be excessive. In addition, the fact that defendant's allow inmates to receive religious publications through the mail contradicts the alleged security and order rationale defendant's proffer as their reason for their ban on non-religious books. The defendant's fail to offer any evidence to show that religious publications are any different than non-religious publications, and pose any less a security and order threat than non-religious publications. Further, the defendant's do not present any actual evidence to show that publications received from publishers or bookstores have in fact constituted a security risk because of actual instances of contraband being discovered in said publications. The defendant's merely make speculative assertions (see Hitchcock Affidavit, page two) without presenting any concrete evidence. Such speculative assertions, without evidentiary basis, have been found to be nothing but "the piling of conjecture upon conjecture", Lyon v. Grossheim, 803 F.Supp 1538,1554 (S.D. Iowa 1992) ("prison officials relied solely on subjective conjecture and speculative concerns totally lacking a factual basis in this record"). Moreover, assuming, arguendo, that the defendant's publication ban is not "an exaggerated response" (which it is) to the alleged security and order problem, the defendant's still fail to satisfy the third factor in Bell requiring access to an alternative source of reading material that is not burdensome or insufficient. As the plaintiff has shown in his affidavits and complaint, the jail's leisure library is both burdensome and insufficient; it contains a repeatedly inadequate number of books that are worn, dated, and of no interest to the plaintiff, and is frequently unavailable to the plaintiff and other inmates (see Plaintiff's affidavits). And unlike inmates in Bell, plaintiff and other inmates at the Main Jail have no access to softcover publications available through the mail to remedy the unavailability of reading material on the jail's

bookcart. Accordingly, the Jail's "alternative"—the leisure library bookcart—fails to meet the reasonable available alternative standard of Bell, and thus violates the plaintiff's First Amendment rights.

The defendant's in their Motion for Summary Judgement refer to the Florida Administrative Code §33-501.401 and Florida Statute §944.11. These references are inappropriate in the present context. They have to do with the State's Department of Corrections, not municipal jails; they affect convicted prisoner's in state prisons, not pretrial detainees in county jails. Furthermore, the State's Department of Corrections, unlike the Broward County Main Jail, conforms to the standards of Bell and Thornburgh; it allows convicted prisoner's to receive softcover publications from publisher's and bookstores through the mail. See Florida Administrative Code §33-3.012. The Broward County Main Jail, on the other hand, prohibits inmates from receiving any non-religious book through the mail, thereby violating the standards in Bell and Thornburgh.

In receiving the applicable constitutional standards and applying them to the facts of the instant case, it is more than evident that the Jail's publications ban and leisure library alternative fail to measure up to the constitutional requirements of Bell and Thornburgh. The defendant's alleged security and order rationale is speculative, without any substantive factual basis, and is plainly vitiated by its policy on religious publications. Accordingly, the defendant's have violated the plaintiff's First Amendment rights.

II. The defendant's are not entitled to qualified immunity as a matter of law.

A. Applicable Law:

A state official is entitled to qualified immunity to the extent that his conduct "does not violate clearly established statutory or constitutional rights of which a reasonable person would have known". Harlow v. Fitzgerald, 457 U.S. 800,818 (1982). That is, it must be "obvious to all reasonable government actors in the defendant's place that 'what he is doing' violates federal law. Lassiter v. Alabama A&M University, 28 F.3d 1146,1149 (11th Cir. 1994) (en banc) "Clearly established law" in the 11th Circuit includes decisions by the United States Supreme Court, the Eleventh Circuit Court of Appeals, or the highest court of the state where the case arose". Jenkins v. Talladega City Board of Education, 115 F.3d 821,826-27, n.4 (11th Cir. 1997)

(en banc). The question the Court in the instant case must ask is: Whether a reasonable jail official in the same circumstances as the defendant's could have concluded that his actions—enacting, imposing, and enforcing a wholesale ban on all non-religious publications sent and received through the mail—violated clearly established constitutional law at that time.

B. Application of the law to the facts:

The review of applicable case law in section I.A., above demonstrates that at the time the defendant's were enacting and enforcing their publication's ban against the plaintiff, they were violating clearly established First Amendment rights of the plaintiff's as enunciated in Bell and Thornburgh. Both cases were decided by the U.S. Supreme Court and were controlling in the Eleventh Circuit at the time the defendant's were enacting and enforcing their publications ban against the plaintiff. While there are no federal appellate cases involving publication bans in the Eleventh Circuit, other federal courts have held publications bans, similar to the one in the present case to be unconstitutional and have denied jail officials qualified immunity because these bans violated clearly established rights as established by Bell and Thornburgh. See Jackson v. Elrod, 881 F.2d 441,444-445 (7th Cir. 1989), Broulette v. Starns, 88 F.3d 512 (9th Cir. 1999), Turner v. Stewart, 188 F.3d 515, (9th Cir. 1999), and Thomas v. Leslie, 176 F.3d 489 (10th Cir. 1999). Defendant's contention in their Motion for Summary Judgement that plaintiff has failed to show that the defendant's have violated clearly established federal law is without merit. The defendant's by enacting and enforcing their publications ban against the plaintiff, clearly violated the law set forth in Bell and Thornburgh prohibiting such broad, over exclusive bans.

Accordingly the defendant's are not entitled to qualified immunity with respect to their violations of plaintiff's First Amendment rights.

C. Application of the law to the facts: the Plaintiff's retaliation claim.

The First Amendment prohibits state officials from retaliating against prisoners for exercising the right of free speech. Thomas v. Evans, 880 F.2d 1235 (11th Cir. 1989), Wright v. Newsome, 795 F.2d 964 (11th Cir. 1986). To state First Amendment claim for retaliation, the inmate need not allege violation of a separate and distinct constitutional right. Thomas at 1242. Rather, the focus is on the act of

retaliation itself, not some alleged violation of a constitutional right. Thomas at 1242. Acts of retaliation in cases in the 11th Circuit include being transferred Bridges v. Russell, 757 F.2d 1155 (11th Cir. 1985), and having one's legal materials confiscated, Thomas v. Evans, at 1242. In the latter case, where a prisoner's legal materials have been confiscated, a denial of access to the courts violation may also arise. Id., at 1242.

In the instant case, the defendant's violated clearly established Eleventh Circuit federal law by retaliating against the plaintiff for his exercise of free speech. The plaintiff filed grievances and letters of complaint against the defendant's. In retaliation, the defendant's transferred plaintiff numerous times, denied him access to the law library, and confiscated his legal materials. In doing so, they violated the clearly established law in Thomas v. Evans and the other above mentioned cases. Accordingly, defendant's are not entitled to qualified immunity as a matter of law.

CONCLUSION

Based on the Plaintiff's Memorandum of Law, Plaintiff's Response to Defendant's Concise Statement of Material Facts, Concise Statement of Material Facts in Chronological Order Concerning the Plaintiff being place in a High Custody Cell, Being Denied Access to the Jail's Law Library, Having Legal Documents Confiscated and Destroyed, Plaintiff's Summary Exhibits 1 thru 53. The Plaintiff in this action prays that this Honorable Court will rule that there are material facts in dispute and grant a trial by jury. That this Honorable Court deny the Defendant's Qualified Immunity Protection in this matter. That this Honorable Court deny in its entirety the Defendant's, JENNE, HITCHCOCK AND BROWARD COUNTY'S, MOTION FOR SUMMARY JUDGEMENT AND INCORPORATED MEMORANDUM OF LAW.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct and complete copy of the foregoing was sent via U.S Mail this 26th day of November, 2000 to ADORNO & ZEDER, P.A. Counsel for Defendants 888 S. E. 3rd AVE. SUITE 500 Fort Lauderdale, FL. 33335-9002.

BY Ross Jay Lawson
ROSS JAY LAWSON FL-97-9905
P.O. BOX 9356
Fort Lauderdale, FL. 33310

CS No: 979905	Control No: [REDACTED]	Master Jacket No: XSN00410	Date Admitted: 12/04/2008
Last Name: [REDACTED]	First: [REDACTED]	Middle: [REDACTED]	SSN: 693-34-3427
Address: AT LARGE	City: [REDACTED]	State: [REDACTED]	Zip: 00000
OBTS: 9499921	AFIS: 500259000410	FDLE: [REDACTED]	Phone: (954) 467-5416

NCIC Fingerprint Class: 21171717052213161509	Arresting Officer Name: SHOTWELL, M
Date Prints Worked: 07/18/1997	Badge No: FL1139
Security Threat Group: [REDACTED]	Agency: [REDACTED]
Comments: 29/54-7834 WC-7906	Arrest Location: 2606 SW 15 ST FTLD
Offense Number: FL97115980	Arrest Date/Time: [REDACTED]
	Arrest No: 979905

Resident Broward County: 25 [REDACTED]	Eye: BLUE	DOB: 03/10/1972	Education: UNKNOWN
Sex: MALE	Hair: BRN	Age: [REDACTED]	Marital: SINGLE
Race: WHITE	Complexion: MEDIUM	POB (City): FORT LAUDER	Employed: Yes No
Religion: OTHER	Height: 6 [REDACTED]	POB (S/C): FLORIDA	Driver's License No: [REDACTED]
Language Spoken: ENGLISH	Weight: 180		State: FLORIDA

**BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
STANDARD OPERATING PROCEDURES**

03/20/97

5.4.1

5.4.1 INMATE MAIL PROCEDURES (REVISED)

The following revised SOP will become effective immediately.

POLICY:

It is the policy of the Department of Corrections and Rehabilitation not to place limits on the volume of lawful mail an inmate may send or receive, or on length, language, content or source of mail. Limitations may be imposed only when clear and convincing evidence exists to justify such limitations for reasons of public safety or facility order and security. Guidelines for inmate correspondence shall adhere to existing laws and rules governing the management of inmate mail.

AUTHORITY:

Florida Model Jail Standards 9.03, ACA 3D-16 and 5D-01 -5D-08

Forms:

Detainee Property Inventory and Transfer Form - **BSO DB#21**

Rejected Mail Notification Form - **BSO DJ#15**

Event Report - **BSO RP#1**

Definitions:

Privileged Mail: Mail addressed to or received from attorneys, the courts, public officials, and the media.

Rejected Mail: Correspondence or material that is sexually explicit, poses a threat to the security, good order or discipline of the facility and/or facilitates criminal activity.

Indigent Inmate: An inmate with one dollar (\$1.00) or less in their commissary account.

PROCEDURE:

A. General Guidelines

1. Written policy and procedures govern inmate correspondence; they are available to all staff and inmates reviewed annually and updated as needed.
2. During the orientation process, inmates are informed of mail procedures. This information is made available to each inmate through the Inmate Handbook.
3. Inmates in special management housing units can send and receive letters on the same basis as inmates in the general population.
4. Unless there is reasonable belief that some limitation is needed to protect public safety or the security and orderly operation of the facility, there will be no limit on the volume of mail an inmate can send or receive or on the length, language, content or source of mail an inmate may receive or send, as long as the inmate can afford the postage.
5. Incoming and outgoing mail will not be held for more than 24 hours and packages will not be held for more than 48 hours, excluding weekends and holidays.

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5.4.1

6. Inmate Correspondence privileges will not be withdrawn as punishment. Mail can be stopped by court order.
7. Both incoming and outgoing mail may be opened and inspected for contraband. Mail is read, censored, or rejected when based on legitimate facility interest of order and security. Inmates are notified when incoming or outgoing letters are withheld in part or full.
8. Mail received for persons not in custody will be returned to the Post Office.
9. Mail Clerks maintain a Daily Log of all mail that is to be returned to sender.

B. Volume of Mail

1. There will be no limitation on the volume of correspondence an inmate can send or receive, or on the length, language content, except where there is reasonable belief that limitation is necessary to protect public safety or facility order and security, as listed in section H2 of this procedure.

C. Limits on Inmate Correspondence

1. Inmates will not correspond with other inmates housed in a Broward County DCR Facility or inmates housed in any other state or local correctional facility without prior approval of the facility superintendent.
2. Inmates such as married couples and immediate family members incarcerated within a Broward County DCR facility may request to correspond with each other, via letter, with approval of the facility superintendent(s).
3. Should approval be granted, it will be the responsibility of the facility superintendent(s) to set specific guidelines, if any, for the correspondence.
4. When correspondence between inmates housed in Broward County DCR facilities has been denied or approved the inmate(s) will be notified in writing.

D. Indigent Inmates

1. Indigent inmates will be supplied with writing materials and postage to correspond with attorneys and the court. In addition, inmates without funds will be supplied writing materials and postage to correspond with their immediate family at reasonable intervals.

E. Privileged Mail

1. Inmates are permitted to send sealed letters to a specified class of persons and organizations, including but not limited to the following: courts, officials of the confining authority; state and local chief executive officers; administrators of grievance systems; and members of the paroling authority. Mail to inmates from this specified class of persons and organizations **may be opened only to inspect for contraband and only in the presence of the inmate, unless waived in writing.**
2. Staff will not open or inspect privileged mail unless there is a reasonable suspicion of a prohibited act listed in section H2 of this procedure. Mailroom staff will stamp all privileged mail, "Legal Mail".
3. Staff will deliver privileged mail to inmates (Mon. - Fri.) and open it in the inmate's presence in order to intercept checks, money orders or other contraband only.
4. An Event Report will be written if contraband found in privileged mail is illegal to possess. The sender will be notified by the Superintendent or designee that the contraband has been seized. If the contraband found is illegal and needed for a criminal investigation or prosecution the seizing deputy will promptly deliver it to the Watch Commander for determination of appropriate action. Chain of custody will be maintained.

03/20/97

5.4.1

5. Contraband found in mail that may be legally possessed outside the detention facility will be returned to sender. Perishable items will be disposed of.
6. Outgoing privileged mail will not be opened, but may be held for a reasonable time not to exceed seventy-two hours pending verification that it is properly addressed to a person or agency.

F. Outgoing Mail Procedures

1. Inmates of the Broward County DCR are permitted unlimited and uncensored correspondence with whomever they wish. Outgoing mail will not be limited unless such mail violates this Standard Operating Procedure, or federal or state law or if done so by a court order.
2. Inmates are permitted to send sealed letters to a specified class of persons and organizations, including but not limited to the following: courts, officials of the confining authority; state and local chief executive officers; administrators of grievance systems; and members of the paroling authority.
3. Outgoing mail may be opened and inspected to determine if:
 - a. The letter contained threats of physical harm against a person or threats of criminal activity;
 - b. The letter threatens blackmail or extortion;
 - c. The letter contains plans to escape;
 - d. The letter contains plans for activities in violation of detention facility rules;
 - e. The letter is in code;
 - f. The letter contains information which, if communicated, would create a clear and present danger of violence and physical harm to a human being.
4. Outgoing mail suspected of containing security threats will be inspected by the Superintendent or his designee. If the inspection proves contraband is present, the Superintendent will initiate a formal investigation into the matter.
5. Outgoing mail will be collected once a day by staff. Mail is collected by the U.S. Postal Service every day except Saturdays, Sundays, and holidays.

G. Incoming Mail

1. Incoming mail will not be held for more than 24 hours, excluding weekends and holidays.
2. Incoming mail may be monitored to ascertain any attempts at escape, security violations or conspiracy to introduce contraband.
3. Incoming mail may be inspected to intercept cash, checks, money orders or physical contraband. Cash, money orders and cashier's checks will be verified and a money receipt completed with a copy placed in the letter for the inmate. The original receipt and legal tender is taken to Inmate Banking and deposited in the inmate's account and a copy is maintained in the Mail Unit.
4. All incoming mail will be researched to determine the presence and location of the inmate in the jail system. Inmates no longer in the system will have their correspondence marked "Return to Sender" and returned to the Postal Service. Inmates in the system will have their housing locations noted on the front of the correspondence.
5. Certified or registered mail is picked up at the Post Office by the Mail Clerks or signed for by a Mail Clerk when it is delivered to a facility by a Postal employee. Certified or registered mail is processed in the same manner as all other incoming mail.

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5.4.1

6. An Event Report (BSO RP#1) will be written if contraband found in mail is illegal to possess. The perimeter deputy will complete Event Reports documenting contraband seized by mailroom staff. The sender will be notified by the Superintendent or designee that the contraband has been seized. If the contraband found is illegal and needed for a criminal investigation or prosecution the seizing deputy will promptly deliver it to the Watch Commander for determination of appropriate action. Chain of custody will be maintained.
7. Contraband found in mail that may be legally possessed outside the detention facility will be returned to sender. Perishable items will be disposed of.

H. Rejection of Mail

1. Inmates will be notified when incoming or outgoing letters are rejected by the completion of the Rejected Mail Notification Form BSO DJ#15.
2. Reasons for rejection of mail may include, but not limited to:
 - a. The letter contained threats of physical harm against a person or threats of criminal activity;
 - b. The letter threatens blackmail or extortion;
 - c. The letter contains plans to escape;
 - d. The letter contains plans for activities in violation of detention facility rules;
 - e. The letter is in code;
 - f. The letter contains information which, if communicated, would create a clear and present danger of violence and physical harm to a human being.

I. Returned Mail Procedures

1. Inmate mail returned to the DCR by the United States Postal System due to insufficient postage or an incorrect address, will be returned to the inmate who originally sent the letter.
2. If the sender's name does not appear on the envelope, then the letter may be opened to ascertain the sender's name, and returned to the sender immediately.
3. Mail received for inmates no longer in custody will be returned to the sender.

J. Publications

1. Books, magazines, and newspapers for inmates will not be accepted through the mail.
2. A variety of outside publications for inmates will be ordered by each facility and made available to inmates through the Inmate Leisure Library.
3. Each inmate may retain a total of four (4) articles of reading materials in their cell; e.g., two (2) magazines and two (2) books. Note: Dictionary, Religious text approved by the Chaplain and other prior approved program books are not included in this total.
4. Inmates will not be permitted to accumulate printed material so as to pose a fire hazard in their housing area.

K. Packages

1. Inmates are only permitted to receive packages containing clothing to be worn at court appearances.
2. Packages containing anything except court clothes will be returned to sender. If the package does not have a return address it will be returned to the US Postal Service.

03/20/975.4.1

3. The Mail Clerk will verify if the inmate is in custody, document the receipt of the package in the Daily Log and forward the package to the scanner deputy for inspection. Facilities not having a scanner will transport packages to the nearest facility to have the packages scanned.
4. Mail Clerks will search scanned packages for contraband. Perishable items will be disposed of. If contraband is found that may be legally possessed outside the detention facility, the entire package will be returned to the sender. If the contraband found is illegal and needed for a criminal investigation or prosecution the seizing deputy will promptly deliver it to the Watch Commander for determination of appropriate action. The perimeter deputy will complete Event Reports documenting contraband seized by Mail Clerks.
5. Mail Clerks will forward inmate court clothing, received in packages, to visitation staff for inspection and placement in the inmate's property.

AFFIDAVIT OF JEFFERY S. GOTTMAN

The undersigned affiant, Jeffery S. Gottman, after being duly sworn, deposes and states the following:

1. My name is Jeffery S. Gottman, and I am over the age of (18) and otherwise sui juris.

2. I make this Affidavit based on my personal knowledge of the contents hereof.

3. On November 11, 1999 I was housed on the 8th floor with inmate ROSS LAWSON.

4. On November 11, 1999 I watched inmate ROSS LAWSON give a file/folder containing a law suit for the Broward County Jail banning inmates from getting publications, grievances & requests on not being allowed to get publications in the Broward County Jail, letters and legal work to do with his criminal case, and other documents to Deputy Wilcox so that she could make copies for him as he requested, because ROSS LAWSON wanted to file the law suit that he had completed on the Broward County Jail not letting inmates get books/publications.

5. I also witnessed inmate PERRY ARCHIBALD give Deputy Wilcox a file to make copies for him as well. Although I do not know what was in ARCHIBALD'S file because he did not talk about or show what was in it.

6. I heard Deputy Wilcox promise both ROSS LAWSON and PERRY ARCHIBALD that they would both get back their papers and copies of such that day.

7. That night 11/11/99 PERRY ARCHIBALD got back his papers and copies of such, but inmate ROSS LAWSON did not. And ROSS LAWSON inquired to the Deputy why, and was told that he did not have anything for him.

8. I also heard classification officers speak with inmate ROSS LAWSON about why he was on the 8th floor. And they told him it was not them or in their hands why he is on the 8th floor, and that administration was the ones that had LAWSON on the 8th floor, and there was nothing they could do to move LAWSON.

9. I heard Deputies tell LAWSON that he could not have access to the law library, per Superintendent Hitchcock.

10. I was also there when LAWSON got the file back that he had given to Deputy Wilcox. The cells were closed but I could hear Deputy McManus speaking with LAWSON. Almost approx. two weeks after LAWSON gave the file to Wilcox, Deputy McManus came to the 8th floor and handed LAWSON his file why LAWSON and we were in our cells. I heard LAWSON tell Deputy McManus that many of his papers were missing. Including I heard LAWSON say that the law suit that he worked on so hard was gone, and he requested to know where his documents and law suit was. Deputy McManus told LAWSON that she only got what she gave him, and he would have to take it up with Mr. Hitchcock.

11. I have overheard Deputies say that they are going to get LAWSON one way or the other for all the problems he is causing Mr. Hitchcock. And the Sheriff.

RESPECTFULLY SUBMITTED,

Jeffery S. Gottman
 Jeffery S. Gottman 5098-22444
 P.O. Box 9356
 Fort Lauderdale, FL. 33310

OATH

BEFORE ME THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED Jeffery S. Gottman, WHO WAS SWORN AND SAYS THAT THE FOLLOWING STATEMENT OF AFFIANT IS TRUE AND CORRECT.

SWORN TO ON THIS 22nd DAY OF November, 2000.

PERSONALLY KNOWN ()

I.D. PROVIDED (x)

TYPE OF I.D. Major Jail Movement Card

Austin Williams
 Austin Williams
 MY COMMISSION # CC756132 EXPIRES
 July 5, 2002
 BONDED THROUGH THE FIDELITY & GUARANTEE CO. INC.

NOTARY REPUBLIC

AFFIDAVIT OF TERRELL L. SESSIONS

The undersigned affiant, TERRELL L. SESSIONS, after being duly sworn, deposes and states the following:

1. My name is TERRELL L. SESSION, and I am over the age of (18) and otherwise sui juris.

2. I make this Affidavit based on my personal knowledge of the contents hereof.

3. I was arrested on July 11, 1998, and booked into the Broward County Jail on the same day.

4. Since my date of arrest the Broward County Jail has had a policy that bans inmates from receiving publications from outside sources.

5. From My date of arrest until on or about March of 1999 Christian literature and Christian publications were the only ones allowed into the jail for inmates. This was an unwritten law that allowed only Christian literature into the jail for inmates.

6. After March of 1999 the jail allowed religious publications for inmates but only religious publication, all others were still banned.

7. I have seen and heard Deputies and jail staff harass inmate ROSS LAWSON about lawson standing up for his rights.


8. I am also willing to testify how the jail's staff takes revenge upon all inmates who stand up for their rights.

9. I have had publications sent to me and they were denied entrance do to the jail's policy.

10. I have been a non-convicted pretrial detainee during my stay in the Broward County Jail.

11. I have written to the jail's administration explaining to them that the ban on publications violates my rights, and they have only denied to make any change.

RESPECTFULLY SUBMITTED,


TERRELL L. SESSIONS
P.O. BOX 9356
Fort Lauderdale, FL. 33310

UNSWORN DECLARATIONS UNDER PENALTY OF PERJURY (28 USCS §1746)

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2000

BY 

AFFIDAVIT OF JOHN J. JUDD

The undersigned affiant, JOHN J. JUDD, after being duly sworn, deposes and states the following:

1. My name is JOHN J. JUDD, and I am over the age of (18) and otherwise sui juris.

2. I make this Affidavit based on my personal knowledge of the contents hereof.

3. I was arrested on May 3, 1998.

4. Since my arrest I have been housed as a pretrial detainee in the custody of the BROWARD COUNTY DEPARTMENT OF CORRECTIONS AND REHABILITATION.

5. The Broward County Sheriff's Office runs the B.C.D.O.C.A.R.

6. From my date of arrest until 3/99 the B.C.D.O.C.A.R. did not allow inmates to receive publications of any kind from any outside source.

7. The only exception that I witnessed on the ban on publications from my date of arrest until 3/99, was that Christian publications, Christian literature, and other Christian materials were coming into the jail. This was not a written S.O.P. but an unwritten law, that allowed inmates to get Christian publications while at the same time denying all other inmate to receive reading material of their choice unless it was Christian material/publications.


8. In 3/99 B.C.D.O.C.A.R. revised it's S.O.P. and allowed inmates to receive only religious publications through the mail, all other publications were still banned from inmates receiving such from any outside source.

9. I have had publications of several types sent to me and rejected because of the ban on publications.

10. After 3/99 I was allowed, and did have religious publication sent to me. Although I would if the Jail would permit love to have other publications of my choice sent to me so that I could make positive of my time, non-religious publications.

11. I have seen and heard Deputies harass and make fun of ROSS LAWSON for attempting to sue over the ban on publications. Deputies have said numerous times that no Court is going to Order the Jail allow books to low life inmates.

RESPECTFULLY SUBMITTED,


 JOHN J. JUDD
 P.O. BOX 9356
 Fort Lauderdale, FL. 33310

OATH

BEFORE ME THE UNDERSIGNED AUTHORITY, PERSONALLY APPEARED ^{John J. Judd} ~~Jeffery S. Gottman~~, WHO WAS SWORN AND SAYS THAT THE FOLLOWING STATEMENT OF AFFIANT IS TRUE AND CORRECT.

SWORN TO ON THIS 20 DAY OF November, 2000.

PERSONALLY KNOWN ()

I.D. PROVIDED (X)

TYPE OF I.D. MAIN Jail Contact Card


 NOTARY REPUBLIC



Austin Williams
 MY COMMISSION # CC756132 EXPIRES
 July 5, 2002
 BONDED THROUGH FARM INSURANCE INC.

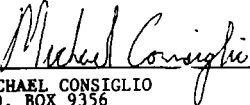
AFFIDAVIT OF MICHAEL CONSIGLIO

The undersigned affiant, MICHAEL CONSIGLIO, after being duly sworn, deposes and states the following:

1. My name is MICHAEL CONSIGLIO, and I am over the age of (18) and otherwise sui juris.
2. I make this Affidavit based on my personal knowledge of the contents hereof.
3. I was arrested in March of 1997, and housed in the custody of the Broward County Jail until June of 1999.
4. From my date of arrest untill on or about March 1999 the Broward County Jail system had a ban on publication that prohibited inmates from getting publications in through an outside source. From my date of arrest untill approx. 3/99 the only exception to this ban was an unwritten policy that allowed Christian material to be admitted to inmates who chose to read Christian literature. No other publications of any kind were allowed to enter the jail unless they were Christian, and this went on from my date of arrest untill on or around March of 1999.
5. In March of 1999 the Broward County Jail started to allow inmates to receive religious publications of their choosing through the mail, but only religious publications, all other publications were still prohibited to inmates untill I left in June of 1999.
6. From my date of arrest untill March of 1999 I received several Christian publications in the mail, including but not limited to, Christian correspondence course, study guides, and other Christian literature and publications.
7. I am also aware of, and willing to testify to the jail's employees and the way that they take revenge on inmates who stand up for their rights. I am a witness to some of the acts that were committed against ROSS LAWSON in the form of revenge.
8. I am now a convicted prisoner and I am assigned to the custody of the D.O.C. And the D.O.C. allows inmates to receive books/publications through the mail.

9. I have also had non-religious publications sent to me while I was housed in the Broward County Jail, and those publications were denied to me.

RESPECTFULLY SUBMITTED,



MICHAEL CONSIGLIO
P.O. BOX 9356

Fort Lauderdale, FL. 33310

UNSWORN DECLARATIONS UNDER PENALTY OF PERJURY (28 USCS §1746)

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2000

BY



Print or type inmate's name (last name, first name) LAWSON, ROSS Arrest Number 57979905
 Print or type inmate's location (Facility/Housing Area/Cell Number) 6A3 Date 10/97

Correspondence addressed to you was received on 10/97 and did not comply with Department Corrections and Rehabilitation correspondence guidelines. Correspondence was rejected and:

☒ Returned to Sender

☐ Other: UA Book (Non-Religious)

BSO DJ#15 (New 7/95)

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION

REJECTED MAIL NOTIFICATION

Print or type inmate's name (last name, first name) LAWSON, ROSS Arrest Number 57979905
 Print or type inmate's location (Facility/Housing Area/Cell Number) 7B2 Date 10/29

Correspondence addressed to you was received on 10/29 and did not comply with Department Corrections and Rehabilitation correspondence guidelines. Correspondence was rejected and:

☒ Returned to Sender

☐ Other: UA EMAIL

BSO DJ#15 (New 7/95)

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION

REJECTED MAIL NOTIFICATION

Print or type inmate's name (last name, first name) LAWSON, ROSS Arrest Number 57979905
 Print or type inmate's location (Facility/Housing Area/Cell Number) 7C3 Date 9/10/99

Correspondence addressed to you was received on 9/10/99 and did not comply with Department Corrections and Rehabilitation correspondence guidelines. Correspondence was rejected and:

☐ Returned to Sender

☐ Other: UA catalog

BSO DJ#15 (New 7/95)

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION

Dep. Meyer

Date: 10/25/97 Inmate's Name: Ross Leaven
 (Alias, if any) 4/13
 Arrest: 10/13/97 Location: 4/13 DOB: 0
 To: Library Coordinator
 Program Specialist ☒ Mailroom ☐ Commissary ☐
 Classification ☐ Food Service ☐ Other ☐
 Nature of Request: This is to request approval and a set of instructions on
how to get books that are unavailable to me on the cat but
are in the library through the inter library loan program.
I am referring to SOP 5.5.1 A.5. I would like self
help instructional videos books (legal) and many others.
Self cover would be fine and reading pres as well.
(Fantasy/Horror)
 Inmate's Signature Ross Leaven Date Signed 10/25/97

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
 ACTION TAKEN/RESPONSE

This rule is no longer in effect. All inmates
are unauthorized to receive any publications in any
way other than the inmate library card. No
newspaper and magazines. Marked out by deputies
on a weekly basis.

Completed By: Taylor CCN 10/8/97 Date: 10/8/97 Time:

All requests will be handled by the responding deputy in one of the following ways:

- ☐ Written Information ☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

Don't ask the business unit to solve this problem, do as follows:

TO BE COMPLETED BY INMATE

Date of Request: 10/28/97

Inmate's Name: Ross, Lawson

Request #: FL97-9905

Location: 6/A/3 DOB: 3/0/72

To:

Program Specialist
Classification ☐

Mailroom
Food Service ☐

Commissary
Other ☒

Nature of Request: How can I get approval for books magazines or a correspondence course. I would like to have them sent to me in the mail at my cost from the publisher. Or any other way you will approve. I had one sent but it was denied and sent back!

Inmate's Signature

Date Signed

IF COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

We do not allow books or magazines from the publisher or through the mail for that matter. It was denied for that reason.

Completed By: Williams CCN: _____ Date: 11/97 Time: _____

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information

☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

Date of Request: 11/5/97 Inmate's Name: Ross Lawson

Request #: 1197-PP05 Location: 6/A/3 DOB: 3/07/2

To: (Informal Grievance) Superintendent

Program Specialist ☐ Mailroom ☐ Commissary ☐
 Classification ☐ Food Service ☐ Other ☒

Nature of Request: The Rule for me on getting books straight from the publisher is unconstitutional and must be fixed
Change it and/or allow me to get them at my
cost straight from the publisher

Inmate's Signature: Ross Lawson Date Signed: _____

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
 ACTION TAKEN/RESPONSE

Denied

Completed By: Wallins CON: _____ Date: 11/97 Time: _____

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information ☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

INMATE'S OFFICE

RECEIVED

11/10/97

ROSS JAY LAWRENCE

11/10/97 B.C.M.J.

11/10/97

I was informed that [redacted] O.P. [redacted] was available to inmates. I requested on a DJ#24 request [redacted] to have [redacted] and [redacted] and a possible correspondence course sent to me or ordered from the inter-library loan program. And I got no response. I got Dept. Wilson to call down to find out if this rule allowing me to get this stuff was still in effect. After the dept. told me that the mail room, property, and administration all said that inmates could no longer get inter library loans and that rule was no longer valid.

Inmate's Signature

11/10/97
Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

TO BE COMPLETED BY THE OFFICE OF INFORMATION AND REVIEW
PART B - RESPONSE

Reviewing Deputy's Signature/CCN

Date

Supervisor's Signature/CCN

Date

TO BE COMPLETED IF INMATE WANTS TO APPEAL RESPONSE.

I _____, wish to appeal the response.

Inmate's Signature

Date Signed

WHEN COMPLETED, KEEP THE TOP OF THE FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

DIRECTOR'S RESPONSE TO APPEAL

Director's Signature
BSO DJ#51 (Revised 4/93)

Date

PCMT 11/20/97
I am writing you to let you know you feel this is a contribution for me to be cleared
and I am not responsible for what is in this report. the freedom to
read what they choose. Freedom of speech freedom of religion
and so on. Fix this craziness please

Rosa Lemos 11 20 97
Inmate's Signature Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

TO BE COMPLETED BY THE OFFICE OF INFORMATION AND REVIEW
PART B - RESPONSE

Reviewing Deputy's Signature/CCN Date

Supervisor's Signature/CCN Date

TO BE COMPLETED IF INMATE WANTS TO APPEAL RESPONSE.
I _____, wish to appeal the response.

Inmate's Signature Date Signed

WHEN COMPLETED, KEEP THE TOP OF THE FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

DIRECTOR'S RESPONSE TO APPEAL

Director's Signature Date
BSO DJ#51 (Revised 4/93)

Date: 11/17/98 Inmate's Name: Ross Lawson
(Alias, if used)
Inmate #: 111111 Location: 7/B/2 DOB: 3/10/72
02-7-B-2-1

To: Chaplin

Program Specialist ☐ Mailroom ☐ Commissary ☐
Classification ☐ Food Service ☐ Other ☐

Nature of Request: This is on the subject of me wanting to get religious books, and other religious material, sent to me by the publisher, at my own cost of course. Please help me in this matter, so as I may help myself to change. And grow closer to the person I want to be. Thank you for your time in this matter! G-D BLESS

Ross Lawson
Inmate's Signature Date Signed 11/17/98

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

The acceptance of mail of any kind is a fail procedure
He do not have the authority to change a procedure

Completed By: Chaplain's Office OCN _____ Date: 11-18-98 Time: _____

All requests will be handled by the responding deputy in one of the following ways:

- ☐ Written Information ☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

Date of Request: Inmate's Name: Ross Lawson
 (Alias, if any)
 Arrest #: FL91-100 Location: 7/B/2 DOB: 9/10/72

To: Superintendent Hitchcock

Program Specialist ☐ Mailroom ☐ Commissary ☐
 Classification ☐ Food Service ☐ Other ☐

Nature of Request: This is on the subject of me wanting to get school books, reading books,
religious books, and more, sent to me by the publisher. At my own cost of course. Please
help me in this matter, and approve this as I may start to change my life for the better.

Thank you for your time in this matter!

Ross Lawson 11/17/98
 Inmate's Signature Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
 ACTION TAKEN/RESPONSE

Books, magazines & newspapers
are not permitted by this facility.

Completed By: [Signature] Date: 11-17 Time:

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information ☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review

If you have any questions, please call the Prisoner's Rights Unit at (305) 306-1234.

TO BE COMPLETED BY INMATE

Date of Request: 11/17/98

Inmate's Name: Ross Lawson
(Alias, if any)

Arrest #: FL97-9905

Location: 7/B/2 DOB: 3/

To: Superintendent Hitchcock

Program Specialist ☐

Mailroom ☐

Commissary ☐

Classification ☐

Food Service ☐

Other ☐

Nature of Request: This is on the subject of me wanting to get school books, reading bo
religious books, and more, sent to me by the publisher. At my own cost of course. Plea
help me in this matter, and approve this as I may start to change my life for the bett
Thank you for your time in this matter!

Ross Lawson
Inmate's Signature

11/17/98
Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE RE BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Your request has been forwarded
to the Commissary and Property

Completed By: [Signature] GEN Date: 11/18/98 Time:

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information

☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Re

If you have any questions, please call the publisher, or so before this

COMPLETED BY: [Signature]

Date of Request: 11/20/98

Inmate's Name: Ross, [Signature]
(Alias, if used)

Arrest #: FLA 98-05

Location: 7/B/2 DOB: 3/10/77

To: Mail Room

Program Specialist ☐
Classification ☐

Mailroom ☐
Food Service ☐

Commissary ☐
Other ☐

Nature of Request: This is on the matter of reading and religious material. I would like
to know the proper procedure I must follow to allow me to get reading and religious
material from the publisher, at my cost of course. Or any other way possible for
me to get this literature. Thank you for your time in this matter!

[Signature]
Inmate's Signature

11/20/98
Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Book, magazines + newspapers
are unauthorized - Prisoner's
has reading material.

Completed By: [Signature] Date: 11-23 Time:

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information

☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

Date: 11/20/98

Arrival: FL 11/20/98

Location: 71N/2

To: Chaplain

02-7-8-2-1

Program Specialist
Classification ☐

Mailroom ☐
Food Service ☐

Commissary ☐
Other ☐

Nature of Request: This is on the matter of receiving religious material straight from the publisher at my cost. Am I to understand that this is being denied to all inmates in the broward county jail, or just me! And I would like a copy sent to me of this rule Please assist me in this matter, and at least help me to get a copy of the jails rul on this matter. Thank you for your time in this matter! G-D BLESS

Ronald Jones
Inmate's Signature

11/20/98
Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Since you are requesting a jail procedure, we are forwarding your request to the Superintendent

11-23-98 Chaplain's Office

Completed By: _____ COX _____ Date: _____ Time: _____

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information

☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review

INMATE REQUEST

Date of Request: 7/98 Inmate's Name: John J. [illegible]
 Arrest #: [illegible] Location: 7/B/2 DOB: [illegible]

TO: Superintendent Hitchcock

Program Specialist ☐ Mailroom ☐ Commissary ☐
 Classification ☐ Food Service ☐ Other ☐

Nature of Request: This is on the matter of mail being sent to me by the publisher. The
religious material I need is not provided to me by the jail. I am JEWISH and must be
allowed to have the publisher send me the material I need at my cost of course. The
magazines and material that the jail orders for inmates is not on the subjects I
need to be of the quality I choose to read or study on. Plus I would very much like
to take some college courses through the mail but am unable to if I can not receive
the material I need. Please help me in this matter.

Inmate's Signature: [Signature] Date Signed: 11/25/98

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
 ACTION TAKEN/RESPONSE

Completed By: _____ CON _____ Date: _____ Time: _____


All requests will be handled by the responding deputy in one of the following ways:

- ☐ Written Information ☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

INTEROFFICE

MEMORANDUM

to: Inmate Ross Lawson #F197-9905 cell 7-B-2
from: William Hitchcock, Superintendent 
Main Jail Southern Operations / Department of Detention
subject: Inmate Publications - reference your request dated 11/20/1998
date: 11-23-1998

Attached Please find the revision of SOP 5.4.1 which governs inmate mail and Publications as signed by Director S. McCampbell on August 23, 1996.

These SOP's are available to you in the inmate Law Library.

cc- file

SPECIAL ORDER 96-33

Date: August 13, 1996

To: ALL PERSONNEL

DEPARTMENT OF CORRECTIONS AND REHABILITATION

From: Susan W. McCampbell, Director
Department of Corrections and RehabilitationSubject: REVISES SECTION J. OF STANDARD OPERATIONAL POLICY 5.4.1
ENTITLED, "INMATE MAIL, ACCESS TO PUBLICATIONS AND INSPECTION
OF LETTERS AND PACKAGES"

The following changes will become effective, October 1, 1996.

J. Publications/ Printed Material:

1. As of October 1, 1996, books and magazines for inmates will no longer be accepted through the mail.
2. A variety of outside publications for inmates will be ordered by each facility and made available to inmates through the Inmate Leisure Library.
3. Each inmate may retain a total of four (4) articles of reading materials in their cell; e.g., two (2) magazines and two (2) books. Note: Dictionary and Bible are not included in this total.
4. Any excess books and magazines in the Property Unit or in the possession of inmates can be vouchered out or shipped (if Commissary funds are available).
5. After October 1, 1996, any excess books or magazines found in-cell or remaining in the Property Unit will be considered contraband and donated to the Inmate Leisure Library if suitable.
6. Storage of books and magazines by the Property Unit will be governed by the existing storage restrictions. (Refer to S.O.P. 4.1.5 Retention of Inmate Property)
7. Inmates will not be permitted to accumulate printed material to such a degree as to pose a fire hazard in their housing area.

The rest of the Standard Operational Policy remains the same.

December 4, 1998

To; Superintendent William Hitchcock/ and The Sheriff of Broward County.

RE: ~~THE~~ **TOTAL BAN ON ALL PUBLICATIONS**

To Mr. Hitchcock,

Sir. I ask that you please discuss this issue with the Sheriff himself, I will also be mailing him a copy of this letter. This letter is on the fact that you responded to me on 11/23/98, and stated that 5.4.1. of the S.O.P., THAT all inmates can not have books magazines, or any type of anything sent to them or dropped of at the jail. This rule is a direct violation of my constitutional rights, freedom of speach and freedom of the press, I meen come on Mr. Hitchcock I am innocent and have not even been convicted if anything, yet you and this jail who is run by the Sheriff are taking away everything from me. This issue about books and magazines, plus my need for a correspondence course is a direct violation of my rights and must be looked into. You simply can not ban me from learning or reading what I choose. Plus the fact that this would be sensoring, which is you are choosing what the inmates can and can not read. this is not germany it is the U.S.A. Please look into this matter A.S.A.P. AND YOU WILL SEE HOW WRONG THIS TRUELY IS, THEN YOU CAN FIX IT! THANK YOU FOR YOUR TIME IN THIS MATTER!

PS I have gone through the request and grievances all to no avail, what else can I do to make you see how wrong this is!

ROSS LAWSON FL97-9905
P.O. BOX 9356
FtLaud, Fla. 33310

CC sheriff Ken Jenne

TO BE COMPLETED BY INMATE

SEP 07 1999

Ross Lawson

7/13/99

7/13 BCNT

9/3/99

PART A - INMATE'S GRIEVANCE

I would like to have a correspondence course sent at my cost to me, Plus books to read so I can improve myself for the better while I await trial. Please spare this it should be a constitutional right for the publisher to send this to me. Thank you for your time!

Ross Lawson

9/3/99

Inmate's Signature

Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

TO BE COMPLETED BY THE OFFICE OF INFORMATION AND REVIEW

PART B - RESPONSE

Put this on a Request Form to the mail Room.

Dr. McManus 6/6/99

Reviewing Deputy's Signature/CCN

Date

Supervisor's Signature/CCN

Date

TO BE COMPLETED IF INMATE WANTS TO APPEAL RESPONSE.

I, Ross Lawson, wish to appeal the response.

Ross Lawson

9/4/99

Inmate's Signature

Date Signed

WHEN COMPLETED, KEEP THE TOP OF THE FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

DIRECTOR'S RESPONSE TO APPEAL

APPROVE

Director's Signature

Date

INMATE'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE REQUEST FORM

If you haven't asked the Inmate Unit Deputy to solve this problem, do so before completing this request.

COMPLETED BY INMATE

Date of Request: 9/9/99Inmate's Name: Ross Lawson
(Alias, if used)Arrest #: FL97-9905Location: 7/4/3DOB: 3/10/73

To:

Program Specialist ☐
Classification ☐Mailroom ☒
Food Service ☐Commissary ☐
Other ☐

Nature of Request: I would like to have a correspondence course sent to me at my cost Plus books to read so I can improve myself for the better while I await trial. Plus some Legal books so I can learn about the law all soft cover. These will be sent to me by the publisher straight to me. Please approve for all or just some. I will pay you need not. Thanks

Inmate's Signature Ross LawsonDate Signed 9/9/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Completed By: _____ OCN _____ Date: _____ Time: _____

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information

☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Public Affairs.

me being inured to me. I have requested the
 Please allow me to have books
 the publisher and/or correspondence courses "as well."

10/8/99
Date signed
FEDERAL BUREAU OF INVESTIGATION
REPLY TO THE CONCERNANCE BOX LOCATED IN EACH POD.
TO BE FORWARDED BY THE OFFICE OF INFORMATION AND REVIEW
PART B - RESPONSE

See Attached

Reviewing Deputy's Signature/CCN

Date _____

Supervisor's Signature/CCN

Date _____

TO BE COMPLETED IF INDICATE WANTS TO APPEAL RESPONSE.

I Ross, wish to appeal the response.

Inmate's Signature Robert L. Brown attached was the Inmate Handbook 10/12/89 Date Signed

WHEN COMPLETED, KEEP THE TOP OF THE VOLUME.

RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

DIRECTOR'S RESPONSE TO APPEAL

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS
&
REHABILITATION



INMATE HANDBOOK

Please See Pgs 2 + 8.

September 01, 1997

INTRODUCTION: You are being held in one of the facilities of the Broward County Sheriff's Office, Department of Corrections and Rehabilitation. Our staff is responsible for your care and safety during the time you are in jail. To assist the staff and yourself, please read this **Inmate Handbook** and follow the rules and regulations. By reading the Handbook you will understand what you can expect, and what is expected of you. All your rights and responsibilities are explained in the Handbook.

This Handbook **must remain** in your possession during the time you are in jail. If you do not understand the information in this Handbook, ask our staff for help. Your safety depends on you following all the rules and obeying the staff.

This Handbook, also has information about programs and services available to you while in jail. If you have any questions about medical issues, attending any of the programs, subsistence fees, or charges/issues that brought you to jail, ask your Housing Deputy, or Correctional Counselor.

GENERAL INFORMATION : When you were booked into this Facility, an arrest number was assigned to you. This number will identify you for as long as you are in jail. It is your responsibility to learn your arrest number. It will help us and you identify and locate your personal property and any charges/issues that are of importance to you.

You will remain in one of our facilities until you post bond, your case is disposed of by the judge, or your sentence is completed.

Misdemeanor and traffic cases are heard in County Court, felony cases are heard in Circuit Court, and if you are here on a civil hold, that case will be heard by a Civil Court Judge.

If you are sentenced to serve one year or less, you will serve your sentence in one of our jail facilities. If your sentence is more than one year, you will be transferred to the State Department of Corrections.

MAIL: Incoming mail must **have your name** under which you were arrested, arrest number, housing location and the address of the facility in which you are housed. The addresses of each Facility are listed below. All mail (**except legal mail**) will be opened and inspected for contraband before it is delivered to you. Legal mail will not be opened until you are present. Mail containing obscene pictures/material will be returned to the sender. Each inmate may retain a total of four (4) articles of reading material in their cell. (Dictionary, religious text approved by the Chaplain and other prior approved program books are not included in this total.) Court clothes and specific items such as eye glasses, hearing aides, etc. may be accepted by mail if prior approval is obtained through the **Property Unit**. Mail to be sent out is to be addressed on a stamped envelope. Mail cannot be sent to another correctional facility.

The locations and mailing addresses of our corrections facilities are listed below.

ACTUAL LOCATION:

Main Jail Bureau
555 SE 1st Ave.
Ft. Lauderdale, Florida 33301

Division of Community Corrections
5400 NW 9th Ave
Fort Lauderdale, Florida 33309

North Broward Bureau
1550 North Blount Road
Pompano Beach Florida 33069

MAILING ADDRESS:

Main Jail Bureau
P.O. Box 9356
Fort Lauderdale, Florida 33310

Division of Community Corrections
P.O. Box 407065
Ft. Lauderdale, FL 33340

North Broward Bureau
P.O. Box 407037
Ft. Lauderdale, Florida 33340

SUBSISTENCE FEES: Inmates booked into the Broward County jail system will be charged a \$10.00 fee to cover the cost of processing. Inmates will also be assessed a \$2.00 a day subsistence fee. This fee will be automatically deducted each day from your commissary account.

If an inmate is **indigent** at the time the fees are to be deducted (\$10.00 one-time per incarceration and \$2.00 daily), the account will be debited for the amount due. The fees will be collected as money is deposited into the inmates escrow account.

TELEPHONE PRIVILEGES: Each unit has telephones available for your use. At the time of booking, telephone calls are free except for long distance calls which are collect. In each housing area/unit, **all** telephone calls will be **limited to thirty (30) minutes** or less per session as determined by the Facility Administrator and will be made as collect calls. Telephones will be turned off during facility lockdown, headcounts, cleaning times, and during meal times. Public Defenders' telephone numbers and some other service numbers are free calls. The telephone is a privilege offered to the inmates while in jail, and if this privilege is abused, it will be restricted.

FREE PHONE NUMBERS:

Public Defender	831-8650
Juvenile Division	831-8557
	831-6773
	831-6774
Complaint Division	831-6768
Misdemeanor Division	831-8690
	831-8691
	831-8693
Intake Division (Call this number if you have not been assigned a Public Defender)	831-8831
Chris Cloney (Class Attorney)	523-5993
Clerk's Office	
Felony	831-5519
BARC (Alcohol/Drug Treatment)	765-4200
Crime Stoppers (TIPS)	493-8477
Crisis Line/Substance Abuse Hotline	467-6333
Spectrum (TASC)	563-6413
Support Enforcement	765-5000
Probation (Misdemeanor and Traffic)	
Central	765-5021
North	831-1280
South (Not available from North Broward)	831-0490
West	831-2300

BULLETIN BOARD INFORMATION: Each housing unit/area has a bulletin board displaying the activities scheduled for that housing area/unit.

COMMISSARY & MONEY: If you had money in your possession when you were booked, an account was started for your use. You were given a receipt for the funds deposited into your account. All other money to be deposited into your account must come through the mail as a **money order** addressed to you with your full name and arrest number. Money orders will be deposited into your account and you will receive a receipt. You will be allowed to use this money to pay for purchases at the commissary on a weekly basis. **Tell** your friends and relatives not to send cash or checks by mail. Please refer to the activities schedule to see which day your orders must be collected and which day your order will be delivered. Commissary is a privilege and if this **privilege is abused**, it will be restricted. You may also use the money in your account to bond yourself out of jail or you may voucher it out to anyone you choose. You can get vouchers from the housing deputy.

CONTRABAND AND SEARCHES: You and your housing area/unit are subject to search at **any time** for security and sanitation reasons. Items **not issued** by the jail, excessive amount of items, purchased through commissary, or listed as in-cell allowable are considered contraband and will be confiscated. If contraband is found in your possession or in your cell, criminal charges and/or in-house disciplinary action may be taken against you.

CODE OF CONDUCT: The following rules and regulations govern inmate conduct and discipline while in BSO corrections facilities. Failure to abide by these rules can result in disciplinary measures.

Any violations in the "A" category listed below may result in up to thirty (30) days of disciplinary segregation, up to thirty (30) days of room restriction, and/or loss of partial or all earned gain time if you are found guilty.

- A-1. Assault or battery or attempted Assault or battery with a deadly weapon.
- A-2. Fighting with another person.
- A-3. Threatening another with bodily harm, spoken or written, any offense against their person or their property.
- A-4. Refusing to obey an order of any staff member.
- A-5. Conduct which disrupts or interferes with the security or orderly running of the institution.
- A-6. Extortion, blackmail, protection, demanding or receiving money or anything of value in return for protection against others to avoid bodily harm, or under threat of informing.
- A-7. Engaging in sexual acts with others, sexual battery or attempted sexual battery.
- A-8. Failing to stand count or interfering with the taking of count.
- A-9. Escape, attempting, planning escape or possession of escape paraphernalia.
- A-10. Wearing a disguise or mask for the purpose of evading detection or escape.
- A-11. Setting a fire or attempting to set a fire.
- A-12. Destroying, altering or damaging government property or the property of another person valued at over \$300.00 dollars.
- A-13. Tampering with or blocking any locking device or any security device (e.g., cameras, windows, etc.).
- A-14. Purposeful contamination of any food or drink.
- A-15. Possession or introduction of any explosive, ammunition, firearm or weapon.
- A-16. Possession of any unauthorized articles that pose a serious threat to the security of the institution (e.g. intoxicating beverages, drugs, firearms/weapons, poisons, caustic or toxic materials, inhalants).
- A-17. Use, possession, manufacture, or sale of drugs, narcotics, or medication not prescribed by facility personnel or of intoxicants; use or possession of authorized medication contrary to prescriptions; being under the influence of any intoxicant.
- A-18. Participation in or encouraging others to riot, strike, commit a mutinous act or major disturbance whether in writing or orally.
- A-19. Engaging in, or encouraging a group demonstration.
- A-20. Encouraging others to refuse to work or participation in work stoppage.
- A-21. Counterfeiting, forging, or unauthorized reproduction of any document, article, or identification, money, security, or official paper.
- A-22. Unauthorized use of mail or telephone for the purpose of engaging in criminal activity as defined in state statutes.
- A-23. Giving or offering any official or staff member a bribe, or anything of value.
- A-24. Extorting money or anything of value, or accepting money or anything of value from, or on behalf of, another inmate, a member of their family, a friend or an associate.

Any violations in the "B" category listed below may result in up to fourteen (14) days of disciplinary segregation, up to fourteen (14) days of room restriction &/or loss of up to 30 days gain time if you are found guilty.

- B-1. Making sexual proposals or threats toward another.
- B-2. Obscene act (indecent exposure). Obscene act either by gesture, written or oral.
- B-3. Destroying, altering or damaging government property or the property of another person valued under \$299.00 dollars.
- B-4. Stealing (theft).
- B-5. Possession of article(s) prohibited when excessive or altered (e.g., excess or altered clothing, linen, money, etc.).

B-6. Leasing of property or anything of value to an inmate not issued through regular institutional channels.

B-7. Mutilating or altering issued clothing, bedding, linen or mattresses or other issued articles.

B-8. Refusing to work.

B-9. Unexcused absence from work, or any assignment.

B-10. Failing to perform work as instructed by a supervisor.

B-11. Participating in an unauthorized meeting or gathering.

B-12. Being in an unauthorized area.

B-13. Failure to follow safety or sanitation regulations.

B-14. Smoking or possession or use of any tobacco products where prohibited.

B-15. Using abusive or obscene language towards another person.

B-16. Gambling, preparing or conducting a gambling pool, possession of gambling paraphernalia.

B-17. Being unsanitary or untidy, failing to keep one's quarters in accordance with posted standards.

B-18. Tattooing self or others.

B-19. Self mutilation.

B-20. Unauthorized contacts with the public or with individuals on behalf of another inmate.

B-21. Disobeying facility regulations.

DISCIPLINARY APPEAL PROCESS: Once your disciplinary hearing is over you will be told if you have been found guilty or not guilty. If guilty, you will be given the reason for the finding. If you are found guilty, the committee chairperson will advise you of the right to appeal by using the **Inmate Request Form**. You **must** submit the Form within fifteen (15) days of the hearing to the Facility Administrator's office. The Facility Administrator, or designee, will approve, disapprove or modify downward the decision of the Disciplinary Committee. You will be informed of the Facility Administrator's decision in writing within five (5) days of receiving your appeal.

GRIEVANCES: Should you have a complaint concerning a facility operations, procedure, or staff, you should follow this procedure for resolution.

1. Speak first with your Housing Deputy or Correctional Counselor. If they **can not** resolve the complaint,
2. Verbally ask to talk with the Unit Sergeant, or the Officer-in-Charge (OIC).
3. If the Unit Sergeant, or OIC, is unable to resolve your complaint, you may file an **Inmate Grievance Form**, by requesting the Form.
4. Fill out the **Inmate Grievance Form**, tear off the top sheet (**white copy**) and keep it as your record. Place the rest of the Form in the special mail box provided.
5. The **Inmate Grievance Form** is forwarded to the Facility Administrator's office where your complaint will be investigated. You will receive a response in writing within twenty (20) business days from the date the Facility Administrator's office receives your complaint.
6. If you are not satisfied with the response, you may appeal to the Administrator by filling out the appropriate section of the Form, and placing it in the special mail box. You will receive a final response within twenty (20) business days. If the Administrator is unable to satisfactorily answer your grievance within the twenty (20) business days, a reason why will be given in writing to you within the twenty (20) business days. The Administrator will respond within thirty (30) business days from the Administrator's receipt of the grievance. Remember, no one always gets the answer that they want all the time. Problems cannot always be resolved immediately nor can staff respond instantly when an issue occurs.
7. The following matters are **not grievable** - classification status, disciplinary action, and housing assignments. If you have concerns regarding these issues you must go through the appeals process by submitting an **Inmate Request Form**. [SEE **DISCIPLINARY APPEAL PROCESS** and **CLASSIFICATION** sections]
8. When an inmate is released and has a grievance issue that is in progress, he/she can contact the Facility Administrator's office of the respective facility for resolution.

CLASSIFICATION: During your stay you may be moved several times to various housing locations that benefit you or our jail system. There are no guarantees - your housing assignment (unit/area) may change and when you are advised to move by the Deputy you must comply with their order. To refuse to follow a Deputy's order may result in a Disciplinary Report. If you have a problem with your move, you can submit an **Inmate Request Form** to Classification after you have arrived at your new location. The request will be responded to in a timely fashion. Your classification status is **not** a grievable issue.

VISITATION:

1. The **visiting** schedule is posted on the bulletin board in your housing area/unit, telling you what day and times you can have visitors.
2. You will be given an opportunity for two (2) hours of visitation per week. You will be allowed a maximum of two (2) visitors during your two (2) hours visitation.
3. It is your responsible to notify your family and friends to coordinate their visits. You will be allowed to visit **only** one time, so make sure that your visitors arrive here at the same time. Anyone who arrives after the visit has started will not be admitted.
4. Your children must be accompanied by an adult and be able to **prove** that you are their parent.
5. You will **only** be taken from the housing area/unit one time for visitation. If you violate any visitation rules, your visitation may be stopped.

RULES FOR VISITORS: Please notify your visitors of the following rules:

- The facility will not accept responsibility for personal property belonging to any visitor.
- Visitors must have proper/current photo identification. **(NO IDENTIFICATION - NO VISIT)**
- Visitors must arrive together and during the official facility visitation schedule.
- Visitors must dress conservatively. Shoulder to waist **must** be covered with non-transparent clothing. Short shorts, mini skirts or short dresses **are not** acceptable attire.
- Visitors may be searched.
- Children must be accompanied by an adult and supervised at all times.
- Visitors cannot be on parole, probation or work release without the written permission of the Facility Administrator.
- Visitors can only visit one person per day.
- Obscene actions or gestures will terminate the visit.
- Visitors are **NOT** permitted to pass/give any items to an inmate. **(Subject to arrest)**

Please notify your visitors that transportation is available by county buses, downtown trolleys, or taxis. They should contact the bus stations for route information.

PERSONAL PROPERTY: (In-Cell Allowable): Personal items you may keep in your cell are listed in the In-Cell Allowable List posted in your housing area. Failure to obey In-Cell Allowable List guidelines may result in disciplinary action.

PERSONAL CLOTHING: Court Clothes will be accepted before your Jury Trial. You must submit an **Inmate Request Form** to the Property Unit (Court Clothes) when you are scheduled for trial. Inmates who are scheduled for a jury trial may have court clothes brought in from outside the facility after receiving prior approval from the Property Unit. No more than two sets of court clothes are allowed on the premises at one time. Sneakers **will not** be accepted. During Alpha Shift on the morning of your court appearance the Housing Deputy should be notified that court clothes will be required for that day. Clothing can not be borrowed or exchanged. Personal clothing cannot be worn accept for the time you are in court for a jury trial. Violation of this rule may result in disciplinary action.

LAUNDRY SERVICES: You are supplied with a clean bed roll and uniform **once** you are assigned a housing location. (Bed roll - sheets, pillow case, towels, a blanket, uniform - long pants, shirt, and when applicable, county issued underwear) Once (1) each week your linen is collected and a clean bed roll will be issued. Uniforms and issued underwear will be laundered two (2) times a week. Personal clothing items will be laundered once (1) each week. Other county issued items will be laundered according to the Facility Administrator's schedule. The times and days are noted on the bulletin board in your area/unit. You **may not** keep extra linen or uniforms in your living quarters.

HEALTH CARE SERVICES: No inmate will be denied medical, mental health and dental care while in custody. Qualified health care professionals are available to provide medical care, mental health care and dental care in all BSO facilities.

You will be medically screened by a nurse during the intake process. It is in your best interest to cooperate with the nurse by giving complete and accurate information regarding your medical history.

Within the first two (2) weeks of incarceration, you will be brought to the clinic for a routine health assessment. Again, it is in your best interest to cooperate with the nurse by giving complete and accurate information regarding your initial medical screening or the routine health assessment.

You may access health care services any day by submitting an **Inmate Medical Request Form** to the nurse. These are available from the nurse who makes daily medication rounds in all housing areas/units.

There is a fee schedule for various services posted in your housing area/unit. If you have money in your account, the cost will be deducted from your account. If you have less than \$1.00 the fee will be charged to your account and will be deducted later when funds become available in your account. You will receive medical, mental health and dental care whether or not you can pay.

Your initial medical/dental screening assessments are free as well as certain other situations which are described and posted in your housing area/unit. Over the counter medication, including pain relievers, are available through commissary.

Upon your release, if you are taking medication, your medication, as determined by the Medical Care Provider will be given to you upon your release.

AIDS/HIV: Information is available, upon your request, from medical personnel or your Corrections Counselor.

PERSONAL CLEANLINESS (Care of Living Quarters): You must bathe at least twice per week and practice good grooming and hygiene habits. You must keep your area/unit clean and share in the cleaning assignments of your housing area/unit.

BARBER SERVICES: Hair care services are available to all inmates. The hair care services will be conducted in accordance with the schedule. You can receive your first haircut thirty (30) days after your initial incarceration and approximately every thirty (30) days thereafter. The thirty (30) day rule may be waived for medical reasons, hygiene reasons, or for inmates scheduled to appear in court. If needed, haircuts for inmates appearing as a **defendant** will be given a haircut within three (3) days of their appearance. You are responsible for signing up for hair care services according to the schedule.

RELIGIOUS SERVICES: Religious services are offered more than once a week for most housing areas/unit. Refer to your schedule to see when they are available to you. Most services are non-denominational. Items such as radios, playing cards or books are **not permitted** at the services. If you want a religious book to be brought into the jail, submit an **Inmate Request Form** to the Chaplain.

RECREATION: The schedule for indoor recreation and outdoor recreation (**weather permitting**) is posted on the bulletin board in your housing area/unit. Sign up for recreation on the sign up sheets provided. You will not be permitted to attend recreation unless you sign up for it. You need to be **quiet and orderly** as you are escorted to the recreation areas.

CORRECTIONAL COUNSELORS: Correctional counselors answer questions about the legal status of your case. They will also help you with visitation, mail, property, drug programs and life skills programs. They visit the areas/units on a daily basis, but can also be reached by using an **Inmate Request Form**.

N.A./A.A./C.A. AND VETERANS PROGRAMS: These voluntary services are provided in most areas/units of the jail. Please refer to the schedule posted on the bulletin board in your housing area/unit. Submit an **Inmate Request Form** to the Correctional Counselors office in order to attend any of these services. Recreational items such as radios, playing cards or leisure books are not permitted at these services.

SCHOOL PROGRAMS: School teachers are available to most housing areas/units for inmates who desire to work on their A.B.A. or G.E.D. If you wish to be tested and/or attend classes, fill out an **Inmate Request Form** and forward it to the school teachers office requesting these programs. To be placed into a school housing area/unit, you will be required to follow additional rules that do not apply to inmates in general population. The School Program also offers Art/Computer and Life Skills classes to those inmates that qualify. Use the **Inmate Request Form** and forward it to the school teachers office to ask to be included in one of these special classes.

LAW LIBRARY: The Law Library is available for your use as shown on the schedule posted in your housing area/unit. Space is limited in the law library, so only go there if you need to do legal research, typing or copying. Recreational items such as radio's, cards, or leisure books are not allowed in the law library. Sign up on the day that the law library is scheduled. Material in the Law Library can be copied, but all copied material must remain in the Law Library.

READING LIBRARY: A reading library containing general reading material is available to all inmates by way of a cart of books brought to your housing area/unit on a regular basis.

DIRECTORY OF SERVICES AVAILABLE UPON RELEASE:

Shelter:

Covenant House

Emergency/temporary shelter & crisis intervention for people under 21, with or without infants;
24-hour intake. 561-5559
733 Breakers Avenue, Fort Lauderdale 561-5559

Faith Farm

Live-in alcohol/drug rehabilitation and work program for men over 17 years of age; 24-hour intake,
minimum 90-day program
1980 NW 9th Avenue, Fort Lauderdale 763-7787

The Lippman Family Center

Emergency/temporary shelter for youth under 18 years of age; 24-hour intake.
221 NW 43 Court, Oakland Park 568-2801

Salvation Army

Emergency/temporary shelter for men, women, families
1445 West Broward Boulevard 463-4572

Women in Distress

Emergency shelter for women and children; 24-hour intake 761-1133

Substance Abuse Services :

Alcoholics Anonymous 462-0265

12 Step Club House/12 Pasos Club
205 SW 23rd Street, Fort Lauderdale
101 CLUB 523-4984
720 SW 10th Street, Pompano Beach 941-9896

Broward County Alcohol & Drug Abuse

24-hour intake for inpatient/outpatient alcohol/drug abuse treatment/counseling
1011 SW 2nd Court, Fort Lauderdale 765-4200

Crisis Line (24 hours)

. 467-6333

Narcotics Anonymous

. 476-9297

Nar-Anon Help Line

. 584-6578

Substance Abuse Hotline

. 467-6333

Health Care:

Broward County Primary Health

Medical and dental care, medications, referrals

900 NW 31st Avenue, Fort Lauderdale 327-2100

Center One (HIV/AIDS)

2518 W. Oakland Park Blvd., Suite 111, Fort Lauderdale 537-4111

Henderson Mental Health Center

Mental health counseling and treatment

330 SW 27th Avenue, Fort Lauderdale 791-4300

Nova Mental Health Center

Mental health counseling and treatment

3111 University Drive, #307, Coral Springs 753-7020

3301 College Avenue, Davie 262-5730

4800 North State Road 7, Suite F, Lauderdale Lakes 486-3663

Food:

St. Lawrence Chapel

101 NE 1st Street, Pompano Beach, Fl. 33060 785-8510

South Beach Park

One (1) block north of the Yankee Clipper Hotel on A1A in Fort Lauderdale

Calvary Church of God in Christ

744 NW 12th Avenue, Fort Lauderdale

Lutheran Co-op Feeding Program

1405 West Broward Boulevard 764-8073

St. John's Episcopal Church

1704 Buchanan Street, Hollywood (10 am to 1 pm except Tues., Sat., & Sun.) 927-9161

Veterans:

Multi-Purpose Center

1532 NE 4th Avenue, Fort Lauderdale 771-1092

Vet Center

315 NE 3rd Avenue, Fort Lauderdale 356-7926

Jobs:

Broward Employment & Training Administration

330 N. Andrews Avenue, Fort Lauderdale 765-4505

Department of Labor

2600 Oakland Park Boulevard, Fort Lauderdale 730-2600

1301 W. Copans Road, Building D, Pompano 969-3541

4205 Hollywood Boulevard, Hollywood 985-4750

Vo-Tech Programs: BETA has a program called the **Offender's Program**. You can take courses at a Vo- Tech school at no cost. It is fully funded through the BETA Program grant money. Upon release, report to a BETA office at one of the Vo-Tech schools.

Atlantic Vocational Center

Fill out an application for acceptance and admittance.

4700 Coconut Creek Parkway, Coconut Creek 977-2000

Sheridan Vocational Technical Center

5400 Sheridan Street, Hollywood 985-3220

A-1-A Bonding	467-2100
A-1 Bonding	467-2100
Begal Bail Bonds	
Bill Daily Bonding	764-4636
Bill Sheppard Bail Bonds	922-3600
Brandy Bail Bonds	463-6866
B & S Bail Bonds	463-4333
	522-7779
Dave Stern Bail Bonds	
Dick's Bail Bonds	961-2334
Dolphin Bail Bonds	946-3535
	523-4559
Easy Out Bail Bonds	
	966-4000
Franklin Bail Bonds	
	581-2915
Gilbert Bail Bonds	
	462-3331
Johnson Bail Bonds	
	922-5047
Mincey Bonding	
	462-3641
O'Connell Bail Bonds	
	467-1505

BOWARD SUPERVISOR'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE'S REQUEST FORM

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 10/13/99Inmate's Name: Ross Lawson
(Alias, if used)Arrest #: FL97-9905Location: 7/B/2 DOB: 3/10/72To: Library CoordinatorProgram Specialist
Classification ☐Mailroom
Food Service ☐Commissary
Other ☒

Nature of Request: According to 5.5.1 (Comprehensive library services) (5) I must request on this form to have magazines, Books, or periodicals sent to me that are unavailable in the inmate (Leisure library). I am requesting to have approval at my cost or yours to have these brought or sent in to me (publisher) or other from an outside source. Please approve so I may have books, magazines, ect. soon of my choice.

Inmate's Signature Ross LawsonDate Signed 10/13/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Completed By: _____ CC: _____ Date: _____ Time: _____

All requests will be handled by the responding deputy in one of the following ways:

Written Information

Personal Interview

All grievances will be responded to in writing by the appropriate official.

DEPARTMENT OF CORRECTIONS AND
INMATE REQUEST

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 10/13/99 Inmate's Name: Ross Lawson
(Alias, if used)
Arrest #: FL97-9905 Location: 7/8/2 8C-24 DOB: 3/10/72

To: Library Coordinator

Program Specialist
Classification ☐

Mailroom ☐
Food Service ☐

Commissary ☐
Other ☒

Nature of Request: According to 5.5.1 (Comprehensive library services) (5) I must request on this form to have magazines, Books, or periodicals sent to me that are unavailable in the inmate (leisure library). I am requesting to have approval at my cost or yours to have these brought or sent in to me (publisher) or other from an outside source. Please approve so I may have books, magazines, ected soon of my choice

Ross Lawson
Inmate's Signature

10/13/99
Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

This rule is no longer valid. No books, magazines, or periodicals, of any kind. The only reading material allowed, must be found on the inmate library cart. (See inmate handbook.)

Completed By: Johnson CCH Date: 11-8-99 Time:

All requests will be handled by the responding deputy in one of the following ways

Written Information

Personal Interview

All grievances will be responded to within 30 days of receipt of the grievance.

SSA [redacted] 10/29/99
On 10/29/99, [redacted] (via Mail Notification) informing me of (VAF) Email is [redacted] a letter typed from one computer to another and can be typed on normal paper. This was a letter to a friend of mine sent to me (violating my constitutional right by not allowing me to have it and sending it back to sender). Why is this being done, correct this problem ASAP and expi.
Ross Lawren 10/29/99

Inmate's Signature _____ Date Signed _____

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

TO BE COMPLETED BY THE OFFICE OF INFORMATION AND REVIEW
PART B - RESPONSE

Reviewing Deputy's Signature/CCN _____ Date _____

Supervisor's Signature/CCN _____ Date _____

TO BE COMPLETED IF INMATE WANTS TO APPEAL RESPONSE.
I, _____ wish to appeal the response

Inmate's Signature _____ Date Signed _____

WHEN COMPLETED, KEEP THE TOP OF THE FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD

DIRECTOR'S RESPONSE TO APPEAL

17th Judicial Circuit in and for Broward County In the County Court in and for Broward County		38 JAN 2 AM 10:47 CLOCK IN
DIVISION: <input checked="" type="checkbox"/> CRIMINAL <input type="checkbox"/> TRAFFIC <input type="checkbox"/> OTHER	ORDER	
THE STATE OF FLORIDA VS. <i>Ross Lawson</i>		CASE NUMBER
PLAINTIFF	DEFENDANT	<i>97-13907C</i>

CHARGE *Burglary (Residence/Battery)*
Carjacking
all other cases

The Court hereby recommends that the defendant, *Ross Lawson*, be given access to the law library at the Broward County Jail for a minimum of seventeen (17) hours per week.

DONE AND ORDERED THIS *23* DAY OF *Jan*, 19 *98*

BROWARD COUNTY, FLORIDA

cc: class
case worker
at Ft. Gt.

[Signature]
JUDGE

COPIES: BSO - SAO

7/21/99
06/13/98

Law Library Schedule:

Lawson, Ross
FL97-9905

MONDAY	0730-1145	Four (4) Hours
TUESDAY	0730-1145 AND 1230-1430	Six (6) Hours
WEDNESDAY	1230-1430	Two (2) Hours
THURSDAY	0730-1145 AND 1230-1430	Six (6) Hours

TOTAL (18) HRS

cc: Supt. W. Roberts
Asst. Supt. W. Robinson
Lt. McPherson
Lt. Garrison
Sgt. Bellavance
6TH Floor Sgt.
Program Deputy

LWSON 0000077

AFFIDAVIT OF ROSS JAY LAWSON

The undersigned affiant, ROSS JAY LAWSON, after being duly sworn, deposes and states the following:

1. My name is ROSS JAY LAWSON, and I am over the age of (18) and otherwise sui juris

2. I make this Affidavit based on my personal knowledge of the contents hereof.

3. I was arrested on July 17, 1997, and booked into the Broward County Jail on the same day.

4. To date I have been housed in the custody of the Broward County Department Of Corrections And Rehabilitation, and I have been a non-convicted pretrial detainee throughout my stay at such.

5. The Broward County Sheriffs Office runs and operates the B.C.D.O.C.A.R.

6. I have been punished and acts of reprisal committed against me for filing/attempting to file this action.

7. Some of the punishments/acts of reprisal in which I had to endure by the Defendants are but are not limited to: (1) being place in a high custody level cell; (2) being denied access to the jail's law library; and (3) having my legal papers, documents, pleadings for this action, etc. confiscated and not returned/destroyed.

8. The Defendants named in this action did not apply the ban on publications equally to all housed at the jail from my date of arrest until 3/20/99.

9. Since my stay at the Broward County Jail, there has been a ban on publications which denied inmates and myself from receiving publication from outside sources.

10. While housed in the Broward County Jail I have had publications sent to me and denied by the B.C.D.O.C.A.R.

11. I am Jewish by birth and practice Judiasm, not Christianity.

12. I have filed this action in good faith, and every aspect of this action in good faith as well.

RESPECTFULLY SUBMITTED,

Ross Jay Lawson
ROSS JAY LAWSON FI-979905
P.O. BOX 9356
Fort Lauderdale, FL. 33310

UNSWORN DECLARATIONS UNDER PENALTY OF PERJURY (28 USCS §1746)

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2000

BY Ross Jay Lawson

TO Sgt. Adams and Deputy Wilcox

6/24/85


RE: LETTER TO INFORM OF CONSTITUTIONAL RIGHTS / HOW RIGHTS ARE BEING VIOLATED / THIS LETTER IS TO GIVE YOU NOTICE OF MY CONSTITUTIONAL RIGHTS TO ACCESS TO THE COURTS, ACCESS TO THE LAW LIBRARY TO HAVE ACCESS TO THE COURTS, AND RULES AND REGULATIONS TO THE COURT ARE FOUND IN THE LAW LIBRARY. THIS LETTER IS TO ADVISE YOU THAT YOU ARE VIOLATING MY RIGHTS. YOU WILL NO LONGER BE ABLE TO CLAIM ADMINISTRATIVE IMMUNITY. THIS LETTER IS TO INFORM YOU THAT IF YOU DO NOT UNDERSTAND THIS YOU SHOULD CONTACT YOUR ATTORNEY AND HAVE HIM ADVISE YOU THAT YOU WILL BE LIABLE NOW THAT YOU HAVE BEEN NOTIFIED OF MY RIGHTS, IF YOU CONTINUE TO VIOLATE THESE STATED IN THIS LETTER. NOTE: BOUNDS VS. SMITH 430 US 817, 828 (1977) AND HOOTEN VS. JENNE, 786 F2d 692, 696 (5th Cir 1986).

PLEASE BE ADVISED I have a court order granting me a minimum of 17 hours per week in the law library. This was followed for more then one year, and only after I filed sui against this jail did my law library time and court order become void in your eyes. The reasons I need this access to the law library are as follows,

- 1) Conflict with lawyer resulting in pro se motions.
- 2) Brevity of confinement 19 cases probable length of incarceration, already two years at least two more to go in the B.C.M.J.
- 3) Pending civil suit for civil damages filed pro se.
- 4) Pending civil rights lawsuit filed pro se.

NOTE YOU ARE VIOLATING MY RIGHTS AND ARE SUBJECT TO BE SUED
PLEASE GET INFORMED AND CORRECT YOUR ERROR AND HONOR MY COURT ORDER
OR I WILL BE FORCED TO FILE SUIT HOLDING YOU RESPONSIBLE FOR YOUR ACTIONS

CC Sgt. Adams
Deputy Wilcox
Director Patrick Tighe
Superintendent Hitchcock


ROSS JAY LAWSON FL97-9905
P.O. BOX 9356
FtLaud, Fla. 33310


763

INMATE

99-198

CORRESPONDENCE

to: Lieutenants W. McPherson and Bechard,
Main Jail, Bravo Shift

from: William Hitchcock, Superintendent 
Main Jail Southern Operations / Department of Detention

subject: Inmate Lawson, Ross F197-9905 (7-C-3)
Law Library Access

date: July 2, 1999

The Subject inmate has a Court Order (see attached) that grants him access to the Law Library on a 17 hour a week basis. He currently has a total of 46 charges against him according to the Classification Staff who researched his files. Only a very few have been concluded in any form. See that Inmate Lawson receives the weekly 17 hour Law Library access as ordered by Judge Lebow on January 23, 1998. If you have time constraints you can not deal with, work with the Charlie shift to get him more access. Let me know if there are any other problems.

CC: Inmate Ross Lawson , 7-C-3
 File

<input checked="" type="checkbox"/> 17th Judicial Circuit in and for Broward County <input type="checkbox"/> In the County Court in and for Broward County		CLOCK IN
DIVISION: <input checked="" type="checkbox"/> CRIMINAL <input type="checkbox"/> TRAFFIC <input type="checkbox"/> OTHER	ORDER	
THE STATE OF FLORIDA VS. <u>ROSS LAWSON</u>		CASE NUMBER
PLAINTIFF	DEFENDANT	<u>97-13907C</u>

CHARGE Burglary (Dwelling/Battery)
Carjacking
all other cases

The Court hereby recommends that the defendant, Ross Lawson, be given access to the law library at the Broward County Jail for a minimum of seventeen (17) hours per week.

DONE AND ORDERED THIS

23

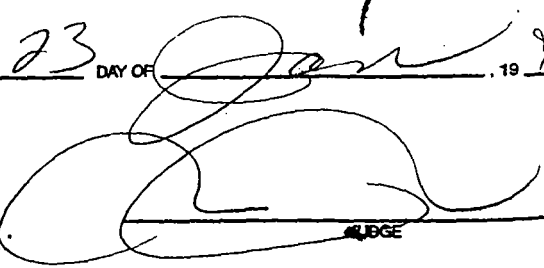
DAY OF

Jan

1998

BROWARD COUNTY, FLORIDA

cc: class
 case work
 Lt. Mr. Gt.



JUDGE

COPIES:

BSO

SAC

RE: LETTER TO INFORM OF CONSTITUTIONAL RIGHTS / HOW RIGHTS ARE BEING VIOLATED / THIS LETTER IS TO GIVE YOU NOTICE OF MY CONSTITUTIONAL RIGHTS TO ACCESS TO THE COURTS, ACCESS TO THE LAW LIBRARY TO HAVE ACCESS TO THE COURTS, AND RULES AND REGULATIONS TO THE COURT ARE FOUND IN THE LAW LIBRARY. THIS LETTER IS TO ADVISE YOU THAT YOU ARE VIOLATING MY RIGHTS. YOU WILL NO LONGER BE ABLE TO CLAIM ADMINISTRATIVE IMMUNITY. THIS LETTER IS TO INFORM YOU THAT IF YOU DO NOT UNDERSTAND THIS YOU SHOULD CONTACT YOUR ATTORNEY AND HAVE HIM ADVISE YOU THAT YOU WILL BE LIABLE NOW THAT YOU HAVE BEEN NOTIFIED OF MY RIGHTS, IF YOU CONTINUE TO VIOLATE THESE STATED IN THIS LETTER. NOTE: BOUNDS VS. SMITH 430 US 817, 828 (1977) AND HOOTEN VS. JENNE, 786 F2d 692, 696 (5th Cir 1986).

PLEASE BE ADVISED I have a court order granting me a minimum of 17 hours per week in the law library. This was followed for more then one year, and only after I filed suit against this jail did my law library time and court order become void in your eyes. The reasons I need this access to the law library are as follows,

- 1) Conflict with lawyer resulting in pro se motions.
- 2) Brevity of confinement 19 cases probable length of incarceration, already two years at least two more to go in the B.C.M.J.
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- 4) Pending civil rights lawsuit filed pro se.

NOTE YOU ARE VIOLATING MY RIGHTS AND ARE SUBJECT TO BE SUED
PLEASE GET INFORMED AND CORRECT YOUR ERROR AND HONOR MY COURT ORDER
OR I WILL BE FORCED TO FILE SUIT HOLDING YOU RESPONSIBLE FOR YOUR ACTIONS

CC Sgt. Adams
Deputy Wilcox
Director Patrick Tighe
Superintendent Hitchcock

Ross Lawson
ROSS JAY LAWSON FL97-9905
P.O. BOX 9356
FtLaud, Fla. 33310

763

Movement History - 5/9/1993 - LAWSON, ROSS

July 22 1999

Event LIBR-MAIN-4 (1143810) scheduled at 07/22/1999 8:00 - 9:30 occurred at 07/22/1999 8:01 - 07/22/1999 9:37

July 26 1999

Event LIBR-MJLL7D (1149824) scheduled at 07/26/1999 9:30 - 10:00 occurred at 07/26/1999 9:59 - 07/26/1999 11:53

July 28 1999

Event LIBR-MAIN-4 (1152685) scheduled at 07/28/1999 12:30 - 14:30 occurred at 07/28/1999 12:33 - 07/28/1999 14:34

July 29 1999

Event LIBR-MAIN-4 (1152584) scheduled at 07/29/1999 7:30 - 9:30 occurred at 07/29/1999 7:36 - 07/29/1999 9:45

July 30 1999

Event VIS-MJ-7C (1154597) scheduled at 07/30/1999 7:00 - 9:00 occurred at 07/30/1999 8:52 - 07/30/1999 12:22

August 02 1999

Event LIBR-MAIN-4 (1160274) scheduled at 08/02/1999 10:00 - 10:30 occurred at 08/02/1999 9:49 - 08/02/1999 11:52

August 04 1999

Event LIBR-MAIN-4 (1162698) scheduled at 08/04/1999 11:30 - 12:00 occurred at 08/04/1999 12:38 - 08/04/1999 12:49

August 11 1999

Event LIBR-MAIN-4 (1172850) scheduled at 08/11/1999 13:00 - 14:30 occurred at 08/11/1999 12:33 - 08/11/1999 14:30

August 13 1999

Unscheduled Event HOUS-UNSCH occurred at 08/13/1999 10:39 - 08/13/1999 10:40

August 16 1999

Event LIBR-MAIN-4 (1176636) scheduled at 08/16/1999 10:00 - 10:30 occurred at 08/16/1999 9:35 - 08/16/1999 11:49

August 17 1999

Unscheduled Event LIBR-CT LIB occurred at 08/17/1999 18:52 - 08/17/1999 22:03

August 18 1999

Event LIBR-MJLLCO (1177502) scheduled at 08/18/1999 12:30 - 14:30 occurred at 08/18/1999 12:33 - 08/18/1999 18:20

August 20 1999

Event VIS-MJ-7C (1180067) scheduled at 08/20/1999 7:00 - 8:00 occurred at 08/20/1999 10:05 - 08/20/1999 12:27

August 23 1999

Event LIBR-MJLLCO (1178041) scheduled at 08/23/1999 9:30 - 11:30 occurred at 08/23/1999 9:33 - 08/23/1999 10:57

August 25 1999

Event LIBR-MJLLCO (1178313) scheduled at 08/25/1999 12:30 - 14:30 occurred at 08/25/1999 12:46 - 08/25/1999 14:22

August 26 1999

Event LIBR-MJLL7C (1182382) scheduled at 08/26/1999 7:30 - 9:30 occurred at 08/26/1999 7:39 - 08/26/1999 9:41

September 01 1999

Event LIBR-MJLLCO (1184423) scheduled at 09/01/1999 12:30 - 14:30 occurred at 09/01/1999 12:28 - 09/01/1999 14:18

September 03 1999

Event LIBR-MJLL7C (1185684) scheduled at 09/03/1999 9:30 - 11:30 occurred at 09/03/1999 9:51 - 09/03/1999 11:44

September 08 1999

LIBR-MJLLCO (1184363) scheduled at 09/08/1999 12:30 - 14:30 occurred at 09/08/1999 12:27 - 09/08/1999 14:23

September 15 1999

LIBR-MJLLCO (1184364) scheduled at 09/15/1999 12:30 - 14:30 occurred at 09/15/1999 12:34 - 09/15/1999 14:25

September 29 1999

LIBR-MJLLCO (1184366) scheduled at 09/29/1999 12:30 - 14:30 occurred at 09/29/1999 12:32 - 09/29/1999 14:26

September 30 1999

LIBR-MAIN-4 (1186313) scheduled at 09/30/1999 7:30 - 9:30 occurred at 09/30/1999 7:38 - 09/30/1999 9:34

October 01 1999

VIS-MJ-7C (1193469) scheduled at 10/01/1999 2:30 - 3:00 occurred at 10/01/1999 11:16 - 10/01/1999 13:03

October 05 1999

HOUS-SCHED (1194552) scheduled at 10/05/1999 21:00 - 22:00 occurred at 10/05/1999 20:29 - 10/05/1999 21:58

INMATE POSTING SHEET

REVISED 5-14-1998

INMATE'S NAME: Lawson, RossARREST NUMBER: FL979905

DATE	LOCATION	CODE	CCN	DATE	LOCATION	CODE	CCN	DATE	LOCATION	CODE	CCN
3/6/99	7C307	R	8699								
10-5	7628-2	7	7976								
11-5	6C162		5344								
11-5	7039-1	R	7976								
11/6	8C241	4	9253								

SUPPORTING DOCUMENTATION

DATE:		CCN:
5/10/99	90 day review no change next review 8-7-99	9022
7/14/99	Reported to I/M request dated 7/14/99 (see attached copy for details)	8088
10-5	For non-viol 4D	7776
11-4	Inmate relocated according to custody level forty five day review new custody (31)	5344
11-5	For higher custody & returning to previous location before 4B, I/M moved to 773 ft. GP.	7976
11/6	I/M now has cust. score of (31) following many DR's for dangerous behavioral/managerial problems including setting fire, fighting, possession of hazardous items, conducts which disrupts. Relo to Admin. Confinement.	
	corrected reassessment & entered in computer - Notified Dep. Foster of Relo	9253
11/16/99	45 day review completed - can't continue in admin. next review 1/123/99.	7713
11/18/99	IM M&T meeting - IM has only 3 pk since 97 and IM prob need to be adjusted then IM has had no problem other than wanting to go to low risk, for CPT missed and made a recommendation review when next meeting.	7713

LWSON 000097

Inmate Name Arrest Number Today's Date Present Location

8th Floor Disciplinary Movement

PLEASE SUBMIT THE DR TO ASSURE INMATE RELOCATION!

- ☐ Inmate DR for Violent/Disruptive behaviors or threatens safety and security of the facility (8th floor B placement)
☒ Inmate Dr for Non-Violent behaviors or doesn't threaten the safety and security of the facility (8th floor C1 placement)
☐ Inmate's DR EXPIRED or was rescinded due to other TECHNICAL VIOLATION
☐ Inmate's sentence MITIGATED due to overcrowding - Relocate from DR lockdown
☐ TIME SERVED - Relocate to appropriate housing

LIST CURRENT KSF'S:

Deputy Sign/Date 10/5/99 Sergeant and/or Lieutenant Sign/Date

Classification: ☒ Approved ☐ Denied (If Ck'd Document Reasons):

Authorized Signature/Date: 10/5/99 New Housing Location: 7B2-8-2

Programs Inmate Relocation

(Choose One)

Request Entry To ☐ OR Request Relocation From ☐

☐ Drug Cell ☐ Relapse Prevention ☐ School Cell ☐ Trusty Status

Reason: ☐ Court Ordered ☐ Self-Referred or Self-Removed ☐ Completed Successfully ☐ Failed to Meet Standards

Current location Requested location Program Coordinator Sign/Date

Classification Approved ☐ Classification Denied ☐ (If Ck'd Document Reasons):

Authorized Signature/Date New Housing Location:

Other Relocations

- ☐ Medical Relocation (Attach MEDICAL RELEASE authorizing return to inmate housing)
☐ Juvenile to Adult Status ☐ 8th Floor Special Administrative (Fill Out and Attach Segregation Review Form)

Classification Approved ☐ Classification Denied ☐ (If Ck'd Document Reasons):

NAME Lawson, Russ J
 ARREST # 19979905 D.O.B. 3/10/72
 H/W 6'0" R/S WM SMT
 CHARGES (1)
 (2)
 (3)

CUSTODY STATUS: med CELL #

DATE	CONTACT MADE WITH DETAINEE ORIENTATION & PLACEMENT BY:	DEPUTY
	uniform was removed. DR for excessive contraband will be written.	LX 5692
10/5/99	DR was written for violation of A9, A16 and B12. Anyways 12-15 days lockdown was guaranteed to det. Lawson after he decided to give me an object that appeared to be a motor hair clipper in order to reduce his lockdown time. However, I told him that his lockdown shall not exceed 15 days.	My 6903
10/5/99	IM PK #78209, JEE CLASS? and briefed by DR. JAMES 10/7/99	88017
10/7/99	DR Committee Found IM Guilty 30 days lockdown 'LOP Rel' 11/6/99	88017
10/31/99	IM WORKED OFF (2) DAYS GAIN TIME, NEW RELEASE DATE 11/4/99.	ES 7568
11-4-99	Relo TO GC 1-6-2	2VFS32
11-4-99	Pic & Briefed By Rep Bellinger	CH8047
11-6-99	Relo To 7C3-9-1 Per Class	CH8047
11-6-99	Relo to 8C204 CO on class	CH8047

LAWSON, ROSS

FL979905

11/4/99

78205

Inmate Name

Arrest Number

Today's Date

Present Loc:

8th Floor Disciplinary Movement and Relocation

☐ Inmate DRd for Violent/Disruptive behaviors or threatens safety and security of the facility

☐ Inmate DRd for Non-Violent behaviors, or doesn't threaten the safety and security of the facility

☐ Inmate transfer from North Broward, DOCC or Conti to the Main Jail due to:

Non-Violent DR _____ or Violent DR _____ (All DR paperwork needs to be sent to Main Jail Classifical

Escape Risk: _____ or Other (Give reason): _____

☐ Inmate's DR EXPIRED or was rescinded due to other TECHNICAL VIOLATION

☐ Inmate's sentence MITIGATED due to overcrowding; Relocate out of DR lockdown and into appropriate housing

☒ TIME SERVED - Relocate to appropriate housing

LIST ARREST NUMBERS OF CURRENT KSFS:

FL988271
#09727821

M4980179
FL98 11223

L. Lentine 11-4-99

S. Rente 11/4/99

Deputy Sign/Date

Sergeant and/or Lieutenant Sign/Date

Received by Classification Specialist:

Date: 11-4-99

New Housing Location:

Inmate Movement and Relocation to Programs

(Choose One)

Request relocation TO a program: _____ OR Request Relocation FROM a program: _____

☐ Drug Cell ☐ Relapse Prevention ☐ School Cell ☐ Trusty Worker

Trusty Coordinator Signature Approval/Da

Reason: ☐ Court Ordered ☐ Self-Referred or Self-Removed ☐ Completed Successfully ☐ Failed to Meet St

Current location

to

Requested Program Location

Received by Classification Specialist:

Date

New Housing Location:

"Other" Types of Movements or Relocations

☐ Medical Relocation (Attach MEDICAL RELEASE authorizing return to inmate housing)

☐ Juvenile to Adult Status ☐ 8th Floor Special Administrative (Fill Out and Attach Segregation Review Form)

Receiving Classification Specialist:

Date

New Housing Location

AFFIDAVIT OF SHARON LAWSON

The undersigned affiant, SHARON LAWSON, after being duly sworn, deposes and states the following:

1. My name is SHARON LAWSON, and I am over the age of (18), and otherwise sui juris.

2. I make this affidavit based on my personal knowledge of the contents hereof.

3. I am the Mother of ROSS JAY LAWSON.

4. I am aware of, and willing to testify about how the jail's staff has harassed my son, do to my son filing suit on them for violating his rights.

5. I have personally called the jail's staff, classification, administration concerning my son being harassed, and to have my son moved to other units for his well being.

6. I have first hand had to deal with the jail's acts of revenge and harassment of both me and my son do to my son filing suit against the jail.

7. I have had sent/and sent publications to my son, and the jail has refused to allow my son to have them.

8. I have spoken to the jail's administration concerning many issues, many of which were acts of reprisal committed against my son in the fashion of revenge.

9. On 11/4/99 my son informed me that Deputies had searched his property after leaving confinement and found a set of pleading that he had drafted on the jail's ban on publications, naming Superintendent William Hitchcock as a Defendant. My son was harassed over this and I called classification and spoke with them, as they assured me after reviewing my sons file that he would be moved to the unit he had come from prior to going to confinement so he would not be harassed.

10. My son was then moved to his old cell, and after he called and told me that they had now took revenge for the law suit he was planning to file, and moved him to the 8th floor. I called and spoke with classification and was told that it was no longer in their hands, administration now decided what they wanted to do with my son.

11. I am also aware and willing to testify to them confiscating my sons legal work, and copy of his original pleadings in this matter. I called over them taking his work and not returning it, and I am willing to testify to such.

12. I am willing to testify to my first hand knowledge concerning all matters related to this action, as I have read many/most of the Motions etc. and have personal knowledge of the facts thereof.

RESPECTFULLY SUBMITTED,


SHARON LAWSON

P.O. BOX 9356
Fort Lauderdale, FL. 33310

UNSWORN DECLARATIONS UNDER PENALTY OF PERJURY (28 USCS §1746)

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 25, 2000

BY 

INMATE'S NAME: Lawson, RossARREST NUMBER: FL979905

DATE	LOCATION	ARREST	INMATE	DATE	LOCATION	CODE	CCN	DATE	LOCATION	CODE	CCN
10-5	762-8-2	7	772								
11-5	764-6-2	7	772								
11-5	763-9-1	R	772								
11-6	802-4-1	4	9253								

SUPPORTING DOCUMENTATION

DATE:		CCN
5-10-99	90 day review no change next review 8-7-99	9000
7-14-99	Reported to I/M request dated 7/14/99 (see attached copy for details)	8088
10-5	for non-viol 4/2	7774
11-4	Inmate relocated according to custody level for 5 day review	5344
	now custody (31)	
11-5	for higher custody & returning to previous location before 4/2, I/M moved to 1712 ft. GP.	7774
11/6	I/M now has cust score of (31) following many DR's for dangerous behavioral/managerial problems including setting fire, fighting, possession of hazardous items, conducts which disrupts. Relo to Admin. Confinement.	
	corrected assessment & entered in computer - Notified Dep. Foster of Relo	925.
11/16/99	5 day review completed - in to continue in admin. next review 12/23/99.	7774
11/18/99	1M M&T meeting - 1M has ab 3 pt score 97 and 1M said not to be abused then 1M has taken problem other the way to go to low level, for CPT said it needs a re-evaluation now in next meeting.	7774

Lawson, Ross EL979905 11-4-99 12-20-99
 Inmate Name Arrest # Review Date Next Review Date

Reason for review: 45 day review disciplinary other
90 day review add charge

Present Custody Level: max (min., med, max. override, or max.)

Present Numerical Rating: 25 Comments:

Severity of New Add Charge: 1

Guilty Verdicts On DRs:

Add:

- +1 for Minor/No Segregation
- +2 for Minor/Segregation
- +3 for Major/No Segregation
- +4 for Major/Segregation
- +6 for Major/Event Report

DR 10/5/99 CE event report was written
9253

Subtract:

- 5 for Completed Program
- 7 for 90 Days/No Incident

TOTAL:

29 9253
31

Custody Level:

Not Changed _____
 Changed To: Med Low _____ Med High _____ Max X

Custody Housing:

Not Changed _____
 Changed To: Med Low _____ Med High _____ Max _____

Program Specialist:

Michelle 6344

(Revised 12/98)

INMATE RELOCATION REQUEST FORM

LAWSON, Ross FL979905 11/4/99 78205
Inmate Name Arrest Number Today's Date Present Loc:

8th Floor Disciplinary Movement and Relocation

☐ Inmate DRd for Violent/Disruptive behaviors or threatens safety and security of the facility

☐ Inmate DRd for Non-Violent behaviors, or doesn't threaten the safety and security of the facility

☐ Inmate transfer from North Broward, DOCC or Conti to the Main Jail due to:

Non-Violent DR _____ or Violent DR _____ (All DR paperwork needs to be sent to Main Jail Classifical

Escape Risk: _____ or Other (Give reason): _____

☐ Inmate's DR EXPIRED or was rescinded due to other TECHNICAL VIOLATION

☐ Inmate's sentence MITIGATED due to overcrowding; Relocate out of DR lockdown and into appropriate housing

☒ TIME SERVED - Relocate to appropriate housing

LIST ARREST NUMBERS OF CURRENT KSFS: FL982271 FL9811283
10972782

L. Venting 11-4-99
Deputy Sign/Date

R. White 11/4/99
Sergeant and/or Lieutenant Sign/Date

Received by Classification Specialist: [Signature] Date: 11-4-99

New Housing Location: _____

Inmate Movement and Relocation to Programs

(Choose One)

Request relocation TO a program: _____ OR Request Relocation FROM a program: _____

☐ Drug Cell ☐ Relapse Prevention ☐ School Cell ☐ Trusty Worker

Trusty Coordinator Signature Approval/Date

Reason ☐ Court Ordered ☐ Self-Referred or Self-Removed ☐ Completed Successfully ☐ Failed to Meet S:

Current location _____ to _____
Requested Program Location

Received by Classification Specialist: _____ Date _____ New Housing Location: _____

"Other" Types of Movements or Relocations

☐ Medical Relocation (Attach MEDICAL RELEASE authorizing return to inmate housing)

☐ Juvenile to Adult Status ☐ 8th Floor Special Administrative (Fill Out and Attach Segregation Review Form)

Receiving Classification Specialist: _____ Date _____

1. The classification of Administrative Segregation will be provided for the non-punitive housing for inmates who need a high degree of supervision due to the inmate's behavior or actual/ or alleged threats to the safety and security of the facility, inmates, staff or self.
2. The Classification staff, Shift Commander, Facility Administrators, Assistant Director or Designee, or the Director of DOD may order immediate segregation of an inmate if needed to protect the inmate, staff or others who might be at risk of harm or injury. Each case will be reviewed within three (3) working days by Classification.
3. The Classification Unit may order the reclassification of an inmate to Administrative Segregation, to include the following but not limited to:
 - a. Exhibits documented anti-social or hostile behavior toward staff or inmates or repeated destruction of county property.
 - b. Is an escape risk.
 - c. Is sentenced to death.
 - d. Is an informant or a state witness.
4. Each reclassification will be reviewed within three (3) working days by Classification.

5. Inmates designated as "keep separate" shall be placed in one of the following "keep separate" categories:
- a. ~~Administrative Segregation~~
 - b. ~~Disciplinary Segregation~~
 - c. ~~Administrative Segregation~~: An inmate that is kept separate from a specific inmate or inmates.
6. When an inmate is designated as a "keep separate", appropriate notification will be made to document the information in the inmate's classification file, Inmate Special Housing/Confinement Record Sheet, Inmate's movement card, CUB contact logcard and other documents as required.
7. Any "keep separate" resulting from a Disciplinary Report will be clearly indicated on the Detainee Relocation Form so that the Classification Unit may proceed with appropriate housing and documentation.

B. General Conditions of Confinement:

1. Inmates placed in Administrative Segregation will be afforded the same basic rights, privileges, services and participation in facility programs as those inmates held in general population unless security and safety requirements dictate otherwise. No Administrative Segregation inmate will be allowed to attend a program with general population inmates while in this classification, unless authorized by the Facility Administrator. The assigned Classification Specialist will make arrangements to deliver the necessary programs to these inmates.
2. Staff members requesting a restriction of any item or activity to an inmate will obtain approval from the Shift Commander prior to implementing the restriction. Clothing and bedding will not be removed from an inmate unless authorized by the Shift Commander and medical staff.
3. A written report will be submitted outlining the reason or basis for restricting an item/activity and will be recorded on the inmate's contact card. The report will be forwarded to the Facility Administrator through the chain of command.

C. Review of Status:

1. The Classification Unit will review the status of all inmates in Administrative Segregation at least every seven (7) days for the first two months and at least every 30 days thereafter. The Classification Unit will provide the inmate with a written report stating the reasons for their decision to keep the inmate in Administrative Segregation or to change the inmates' classification, as well as a summary of the information considered in making the decision.
2. Each review will include an evaluation of the following inmate information:
 - a. Original reason for the inmate's segregation and behavior while in segregation.
 - b. Disciplinary record;
 - c. Past criminal record;
 - d. Psychological background;
 - e. Adjustment history;
 - f. Habitual conduct or language of a type expected to provoke or instigate stressful, perhaps violent situations;
 - g. Any pertinent information submitted by staff
3. Inmates who have been held for longer than two (2) months may be referred to the mental health staff for evaluation if deemed necessary by the inmate's behavior. Classification staff will consider any alternatives available and what, if any, assistance could be provided to the inmate to facilitate their return to the general population.

4. If classified as Administrative Segregation, the inmate should remain classified as Administrative Segregation, the inmate may appeal the classification to the Facility Administrator.

D. Review Process for Release:

1. Before inmates are released from Administrative Segregation, a full review of the inmate's file and reasons for placement in Administrative Segregation will be conducted by the Classification Unit to determine if the inmate's reclassification is warranted.
2. Should it be determined that the initial reasons for placement in Administrative Segregation no longer exist, the inmate will be returned to general population.
3. The Classification Unit will document all reclassifications from Administrative Segregation including date, reasons for release, and the releasing authority.

E. Rights and Privileges of Inmates in Administrative Segregation:

1. Meals:

- a. The quality and quantity of meals will be the same as provided the general inmate population and will not be altered or withheld.
- b. The meals must meet basic nutritional requirements.
- c. Alternative meal service will be made available on an individual basis and will be based on health or safety considerations only.
- d. Alternative meal service must be approved in writing by the Shift Commander and responsible health authority.
- e. The type of alternative meal service will be designed to eliminate the hazardous condition and will not be used longer than seven (7) days.

2. Personal Property:

Inmates classified as Administrative segregation will be provided prescribed medication, clothing that is not degrading and access to basic personal property unless this property poses imminent danger to the inmate or other inmates.

3. Personal Hygiene:

- a. Inmates will be provided with the same hygiene items as provided the general population. Razors will be issued by deputies and retrieved after the inmate has been given a reasonable amount of time to shave.
- b. Inmates will be provided the opportunity to shave and shower daily.
- c. Hair care services will be provided as often as for the general population.

4. Clothing, Bedding and Linen:

- a. Clothing, bedding and linen will be issued and exchanged on the same basis as inmates in the general population.
- b. Clothing and linens will not be removed from an inmate unless authorized by the Shift Commander and medical staff. Exceptions will be justified in writing in the Daily Logbook, on the inmate's control card, applicable CJIS fields, and in the Shift Commander's log.

5. Laundry Service:

Inmates will be provided laundry service as often as general population inmates.

6. Telephone:

Inmates will be allowed telephone privileges.

7. Commissary:

Inmates will be allowed commissary privileges consistent with inmates in general population.

8. Programs and Services:

- a. Inmates will have the same access to programs and services as those afforded in general population unless safety and security requirements dictate otherwise.
- b. Programs and services include, but are not limited to: education, commissary, leisure and law library services, social services, counseling, religious services or guidance, and recreation.
- c. Inmates unable to participate in programs outside their cell will be provided programs and services upon request on the Inmate Request Form (BSO DJ#24) as follows:
 - (1.) The Chaplain or designee will visit inmates in their housing unit to provide religious guidance and counseling.
 - (2.) The school teacher will provide inmates with course outlines and required materials.
 - (3.) Classification Specialists/Program staff will be permitted to visit inmates in their housing areas.

9. Correspondence:

Inmates will be permitted to send and receive correspondence as often as the general inmate population.

10. Visitation:

- a. Inmates will be afforded visitation privileges which are available to the general inmate population, unless safety and security requirements dictate otherwise.
- b. It will be the responsibility of the inmates to inform potential visitors by mail or telephone should they be denied visitation privileges. Staff should inform inmates of this responsibility at the time the restriction becomes effective.

11. Law Library:

Inmates classified as Administrative Segregation will have access to legal materials from the law library by completing an Inmate Request Form.

12. Reading Materials:

- a. Inmates may request reading materials from the leisure library and may possess comparable amounts of general reading materials available to the general inmate population. Reading materials will be delivered to the housing unit.
- b. Newspapers will be delivered to the segregation units on the same schedule as for general population as determined by the Facility Administrators.

13. Exercise:

- a. Inmates will be provided with an opportunity to exercise outside their living area, weather permitting, a minimum of one (1) hour a day, five (5) days a week subject to security and safety considerations.
- b. Inmates unable to participate with other inmates or confined to their cell will be allowed outside, at least once a day for one (1) hour to exercise and shower when no other inmates are present.

F. Documentation:

1. An Inmate Special Housing/Confinement Sheet (BSO DJ#3) will be maintained by deputies for all inmates that are in lockdown status. Information to be contained on the confinement sheet will include, but is not limited to, the following:
 - a. Name and arrest number of inmate,
 - b. Cell location,
 - c. Date admitted,
 - d. Reason for segregation/lockdown
 - e. Actual or anticipated release date,
 - f. Special needs or restrictions,
 - g. Special medical or psychiatric problems,
 - h. The authorizing official.
2. In addition to the requirements for a confinement sheet, staff will maintain frequent observation of inmates in lockdown status. These inmates will also receive regular visits from Supervisors and Health Care staff.
 - a. All inmates in lockdown will be observed at intervals not to exceed thirty (30) minutes. All thirty (30) minute observation checks will be documented on the Inmate Check Sheet (BSO DJ#92) and/or the CJIS system.
 - b. Inmates classified as Administrative Segregation will receive a daily visit on each shift from the Sergeant and the Shift Commander. Visits from supervisors will be documented on the Inmate Special Housing/Confinement Record Sheet (BSO DJ#3).
 - c. Program staff will visit inmates upon receiving a Request Form. All inmate requests received by program staff will be answered in a timely manner.
 - d. Health care staff will visit three (3) times a week.
3. Staff will maintain written records of all admissions and releases of inmates from the unit in the Daily Logbook/CJIS System.
4. Unusual activity or behavior of individual inmates will be recorded in the Daily Logbook, on the Detainee Contact Card (BSO DJ#67) on the Inmate Special Housing/Confinement Sheet, and in the CJIS system.
5. All personnel who visit the Administrative Segregation Unit will sign the Daily Logbook or be entered into the appropriate CJIS log, citing the time, date, and purpose of their visit.
6. All staff and contractors, not officially assigned to the Administrative Segregation Unit, should be discouraged from entering the area for any reason other than to fulfill official responsibilities and duties.

G. Assigned Staff:

1. The training of all assigned staff will include the types of inmates who are typically classified as Administrative Segregation and instructions on safety and security precautions unique to the Administrative Segregation housing unit.
2. Supervisors will evaluate the performance of staff assigned to supervise inmates classified as Administrative Segregation by means of daily observation. Any indication of below-average job performance will be reported promptly to the Facility Administrators. Assigned staff will be removed from the unit immediately if there are continuous reports of unsatisfactory job performance. Depending on the intensity of the assignment, staff may need to be rotated.

AUDITS: Audits must be conducted at least annually in accordance with the Internal Audit Schedule.

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE'S REQUEST FORM

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 11/8/99 Inmate's Name: Ross Lawson
(Alias, if used)
Arrest #: FL979905 Location: 8/C/2 DOB: 3/10/72
To: Law Library
Program Specialist ☐ Mailroom ☐ Commissary ☐
Classification ☐ Food Service ☐ Other ☐
Nature of Request: I am approved by the Superintendent
Hitchcock to have 17 hours access to the law
library per week! Please place me
on a list for such time!
or get approval!
Inmate's Signature Ross Lawson Date Signed 11/8/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:

ACTION TAKEN/RESPONSE

You are on lockdown. You must submit
a request slip to the housing unit on the
mailbox.

Completed By: aw OCN: _____ Date: 11/11/99 Time: _____

All requests will be handled by the responding deputy in one of the following ways:

- ☐ Written Information ☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE'S REQUEST FORM

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 11/8/99 Inmate's Name: ROSS LAWSON
(Alias, if used)
Arrest #: FL979905 Location: 8/C/2 DOB: 3/10/
To: CASE WORKER - LAW LIBRARY
Program Specialist ☐ Mailroom ☐ Commissary ☐
Classification ☐ Food Service ☐ Other ☒

Nature of Request: I need copies
made of legal work!Inmate's Signature ROSS LAWSONDate Signed 11/8/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Completed By: _____ CCN: _____ Date: _____ Time: _____

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information ☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 11/10/99 Inmate's Name: Ross Lawson
(Alias, if used)
Arrest #: FL 97-9905 Location: 8/C/2-4 DOB: 3/19/72
To: Sgt. 8th Floor
Program Specialist ☐ Mailroom ☐ Commissary ☐
Classification ☐ Food Service ☐ Other ☒

Nature of Request: I have a memo by Hitchcock approving me for 17 hours in the law library. I spoke with (Director Patrick Tighe) he informed me I will be allowed to go when will I have access to copies, type writers, legal research book and Florida law books, or/and access to the law library (I have Deni).
Inmate's Signature: Ross Lawson Date Signed: 11/10/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

As per our conversation today, 11-22-99, you will not be allowed to go to the law library until a memo has been reviewed from Captain Hitchcock authorizing how your going to the law library will be done and if it will be done at all.

Completed By: PA 9th Ckt CCN: 280 Date: 11-22-99 Time: 0815

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information

☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE'S REQUEST FORM

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 11/11/99Inmate's Name: Ross Lawson
(Alias, if used)Arrest #: F197-9905Location: 8/C/2DOB: 3/10/77

To:

Program Specialist ☐
Classification ☐Mailroom ☐
Food Service ☐Commissary ☐
Other ☒

Nature of Request: I have a legal deadline and need copies made My last request for this was never answered in the proper time frame If you will not assist me and continue to deny me access to the counts because of my denial of copies and supplies my next step will be a Grievance Then outside intervention!

Inmate's Signature

Ross Lawson

Date Signed

11/11/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Copies of legal papers can be arranged through the law library. Check with your Deputy

Completed By: MDCCN 4341Date: 11-13-99

Time:

All requests will be handled by the responding deputy in one of the following ways:

☐ Written Information☐ Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

On 11-11-99 I watched Ross Wilson give a complete packet
or file folder containing a lawsuit in grievances to
Dep Wilcox. To have her make 5 copies of each for Ross
the lawsuit was for the Seminole County Jail not
letting us get books in, and letters and legal work to his
attorney.

(Inmate) Robert Williams (57-97-17046)

Perry Archibald 50999349

Lynn J. Brown (57-98-15180)

Jeffrey S. Lottman (50-98-22444)

Vincent Peter 5097-25613

HOWARD STREET'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE GRIEVANCE FORM

Director Patrick Tighe
William H. Hitchcock

TO BE COMPLETED BY INMATE

Ross Lawson 1111 FL97-9925 8/2 BCMW 11/12/99
Inmate's Name Arrested Cell Facility Date

PART A - INMATE'S GRIEVANCE

On 11/12/99 Sgt Calvin told me I was not praise and my 17 hours access to the law library will be denied. Furthermore all my access to the law library will be denied. I showed him my means from (Hitchcock) dated July 2, 1999. I am a praise litigant in several actions against BCMW Plus as in Tessa the defendant is the master of his own defence. I am forced not to be his being clear. This is a direct act of refusal to defer me from swinging for my rights against this jails violations of due process and the USA constitution.

Ross Lawson 11/12/99
Inmate's Signature Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM.

RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

TO BE COMPLETED BY THE OFFICE OF INFORMATION AND REVIEW

PART B - RESPONSE

As I told you earlier, I had Patty and Capt. Hitchcock check out your problem and it was discovered that you are not praise and that Mr. Paley is your attorney and also personally told you this face to face and it was apparent that you didn't like the findings after disproving your claims.

Reviewing Deputy's Signature/CCN

Date

11/12/99
Supervisor's Signature/CCN 11-12-99
Date

TO BE COMPLETED IF INMATE WANTS TO APPEAL RESPONSE.

I Ross Lawson wish to appeal the response.

Ross Lawson (Tampro Se) 11/24/99
Inmate's Signature Date Signed

WHEN COMPLETED, KEEP THE TOP OF THE FORM.

RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

DIRECTOR'S RESPONSE TO APPEAL

Director's Signature

Date

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE'S REQUEST FORM

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 11/18/99Inmate's Name: Ross Lawson
(Alias, if used)Arrest #: FL97-9905Location: 8/c/2 #4 DOB: 3/10/72To: Depl. WilcoxProgram Specialist
Classification ☐Mailroom
Food Service ☐Commissary
Other ☒

(Nature of Request: Ms. Wilcox on 11/11/99 I gave you legal work
requests and US 1983 civil suit papers to have copies made for me
because I'm housed in 8/c/2 and unable to go to the law library, thus
I must go through you. Why have I not gotten my legal work back (incl.
copies) You are personally denying my access to the courts! I want
my copies made and my original sent back to me ASAP please e.

Inmate's Signature Ross LawsonDate Signed 11/18/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Capt. Hilditch has all your papers
and will request to take them

Completed By: AW

CCN

Date: 11/22

Time:

All requests will be handled by the responding deputy in one of the following ways:

☐

Written Information

Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

BROWARD SHERIFF'S OFFICE
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE'S REQUEST FORM

If you haven't asked the housing unit deputy to solve this problem, do so before completing this request.

TO BE COMPLETED BY INMATE

Date of Request: 11/19/99

Inmate's Name: Ross Lawson
(Alias, if used)

Arrest #: FL97-9905

Location: 8/c/2 #4

DOB: 3/10/72

To: Super Intendent; William Hitchcock

Program Specialist
Classification ☐

Mailroom
Food Service ☐

Commissary
Other ☒

Nature of Request: Mr. Hitchcock I was informed that the legal papers I request to have copies made of some how ended up in your possession. I gave these to Dept Wilcox of the Law Library to have copies made. Why do you have them. Why have they not been copied and returned to me. You are violating my access to the courts! Please return my papers.

Ross Lawson
Inmate's Signature

11/19/99
Date Signed

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

Completed By: _____ CQI: _____ Date: _____ Time: _____

All requests will be handled by the responding deputy in one of the following ways:

Written Information

Personal Interview

All grievances will be responded to, in writing, by the Office of Information and Review.

INMATE**99-7****CORRESPONDENCE**

Date **November 23, 1999**

To: **Inmate Lawson, Ross #57979905**

From: **Deputy J. McManus, Report Coordinator,
Administrative Aide to Captain Hitchcock,
Main Jail, South Operations**

Subject: **The file**

The file Dep. Wilcox had taken from you contained Grievances, Inmate Request Forms, Commissary Ledgers. One of the Commissary Ledgers was altered. We noticed that on September 10, 1999 there was a deposit of \$165 put into your account. On the same day it was disbursed back out. From talking with your family member on November 22, 1999, you received money for a claim for some lost property. Why you would change this ledger we do not know. I will turn the file back to you today, the way we received it.

**Cc. Captain Hitchcock
File**

INMATE

99-9

CORRESPONDENCE

Date **November 24, 1999**

To: **Inmate Lawson Ross #57979905**

From: **Captain William G. Hitchcock**
Main Jail, South Operations

Subject: **Access to Law Library**

Your complaint about access to the Law Library was sent to our Legal Department. They have informed me that they would provide an answer on December 3, 1999.

Cc. File

DOCUMENT 34 Edward Sheriff's Office
DEPARTMENT OF CORRECTIONS AND REHABILITATION
INMATE GRIEVANCE FORM

TO BE COMPLETED BY INDICATE

Ross Lawson FL97-9805 8/2 BCMJ 11/24/99

PART A - INMATE'S GRIEVANCE

PART A INMATE'S GRIEVANCE
This is to grieve the fact that the file that Dept. Wilcox took from me on 11/11/89 was returned to me today yet all my Criminal paper work letters to my attorney, question ect ect ect was missing please send me back my legal papers ASAP. None of these should have been read or taken. This is unconstitutional!!

Inmate's Signature Rees, Lawrence Date Signed 11/24/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

TO BE COMPLETED BY THE OFFICE OF INFORMATION AND REVIEW
PART B - RESPONSE

Reviewing Deputy's Signature/CCN

Date

Supervisor's Signature/CCN _____ Date _____

TO BE COMPLETED IF INMATE WANTS TO APPEAL RESPONSE.

I , wish to appeal the response.

Inmate's Signature	Date Signed
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WHEN COMPLETED, KEEP THE TOP OF THE FORM.
RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

DIRECTOR'S RESPONSE TO APPEAL

Director's Signature _____ Date _____

INMATE

99-299

CORRESPONDENCE

to: Inmate Lawson, Ross FL97-9905

from: Captain William Hitchcock, 
Main Jail Southern Operations / Department of Detention

subject: Law Library

date: December 3, 1999

I have consulted with our legal division regarding your court order requesting additional Law Library time. E. Williams, P.A. verified that the court order states that we are 'requested' to allow you to attend the Law Library 'according to our policy and procedures'. Our policy is to schedule law library time for the entire population on an equal basis with the exception of inmates who are pro se (who have no assigned attorney of record).

We feel that inmates who are pro se, obviously require additional law library time. We also feel that inmates who have attorneys of record are provided ample scheduled time for their legal needs. Any further infringement on the Law Library schedule would lessen the time for other regularly scheduled inmates and valid pro se cases. As you have an attorney of record and are not pro se, we are no longer inclined to provide you with any additional Law Library time.

You also asked why you could not have more than 20 copies of a particular set of documents. Our long standing rule, which was promulgated years ago according to F.S.S. 33-8 detention facility codes (see attached), limited copies to the number fifteen. We feel that 20 copies are a proper number of copies to allow for total access to the courts and all other entities that would require a copy. If you deem you still require more copies, I request a written list of all entities that you feel require a copy for your purposes. The copies will be allowed if the list is followed with proper justification for need of copies being made for those areas.

cc: Elijah Williams, P.A.
X/O Lt. M. Powers
File

DEPARTMENT OF CORRECTIONS AND REHABILITATION

2: Dept J McManus → INMATE GRIEVANCE FORM And William Hitchcock

TO BE COMPLETED BY INMATE

Ross Jay Lawson

FL97-9905

7/02

BCM/J

DEC 18 1999

Inmate's Name

Arrest

Cell

Facility

Date

PART A - INMATE'S GRIEVANCE

This is on a grievance I wrote that was never answered concerning my legal work that was taken by Dept Wilcox of the L.H. The Memo I got back from you along with a file folder. The file folder you return to me had some of my paperwork. But all my copies of criminal work, letters, noted discovery, ect. ect. plus my original civil suit against publishers are missing. When you dropped my file off I told you my stuff was missing you have done nothing about it. Please find out where my papers are

Inmate's Signature

Ross Lawson

Date Signed

12/15/99

WHEN COMPLETED, KEEP ORIGINAL (WHITE) FORM.

RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

TO BE COMPLETED BY THE OFFICE OF INFORMATION AND REVIEW

PART B - RESPONSE

Dep Wilcox stated she had taken the file gave it to Capt Hitchcock. - Then I returned it to you.

Dep J McManus 11/1

Reviewing Deputy's Signature/CCN

Date

Supervisor's Signature/CCN

Date

TO BE COMPLETED IF INMATE WANTS TO APPEAL RESPONSE.

I Ross Lawson wish to appeal the response why was it read in the first place and where is my case signed

Inmate's Signature

WHEN COMPLETED, KEEP THE TOP OF THE FORM.

RETURN ALL OTHER COPIES TO THE GRIEVANCE BOX LOCATED IN EACH POD.

DIRECTOR'S RESPONSE TO APPEAL

Director's Signature

Date



INMATE SPECIAL MANAGEMENT AND SEGREGATION REVIEW FORM

(Revised 11/15/1999)

LAWSON, ROSS

Inmate Name

57979905

Arrest Number

11/25/99

Today's Date

Initial Custody Score

17

Current Custody Score

31

Current Location

8C2-4

Special Management Housing Type Recommended: ☒ Close Supervision ☐ Protective Custody☐ Adjustment Unit☐ Administrative Confinement

This review is:

☐ Initial Review☐ 24 hrs☐ 48 hrs☐ 72 hrs☒ 7 day☐ 30 day

Reasons for inmate's initial segregation:

17 was a custody level of 31 due to 3 prior DR's since 1M was incarcerated. 1M DR's consisted of behavioral problems, fighting, possession of contraband items, fire setting.

Determination of Management Team:

☒ Continue Segregation☐ Change Segregation Type☒ Discontinue Segregation return inmate to G.P.

Explanation:

Some statutes were investigated & found to be not valid. 1M's decision was to place 1M in 7DR HIGH RISK AS A STEP DOWN. IF Problems occur 1M will be placed back on 8DR floor.

Date begun in Segregation

11/6/99

Next Review Date:

Those Present at Management Team:

SGT. CALVIN, A SCHRADEL, K. W. W. W.

CDA

Classification Specialist

K. W. W. W.

Supervisor

11/25/99

INMATE'S REQUEST FORM!

you haven't asked the housing unit deputy to solve this problem, do so before completing
is request.

TO BE COMPLETED BY INMATE

te of Request: 12/17/99
 Inmate's Name: ROSS Lawson
 (Alias, if used)
 rest #: FL979905
 Location: 70B DOB: 3/10/72

To: Law Library

Program Specialist
Classification

Mailroom ☐
Food Service ☐

Commissary ☐
Other ☐

ture of Request: I have a court order please
place me for all available
times

Thank you

Rate's Signature Ross Lerner Date Signed 12/17/98

ON COMPLETED, KEEP ORIGINAL (WHITE) FORM. RETURN ALL OTHER COPIES TO THE INMATE REQUEST BOX LOCATED IN EACH POD.

DO NOT WRITE BELOW THIS LINE:
ACTION TAKEN/RESPONSE

~~I need to see a copy of your
Court order before I can schedule
you for Court order entry slot.~~

it was told You cannot come down
with Court orders.

Completed By: M. Murphy car: 66465 Date: 12/17/95 Time: 10:50

1 requests will be handled by the responding deputy in one of the following ways:

Written Information

Personal Interview

It is recommended to be reviewed by the Office of Information and Review.

Docket as of August 30, 2000 7:27 pm

Web PACER (v1.2)

U.S. District Court
Southern District of Florida (FtLauderdale)
CIVIL DOCKET FOR CASE #: 00-CV-6009

Lawson v. Broward Sheriff's, et al

Filed: 01/04/00
Assigned to: Judge William P. Dimitrouleas
Demand: \$0,000
Nature of Suit: 550
Lead Docket: None
Jurisdiction: Federal Question
Dkt# in other court: None
Cause: 42:1983 State Prisoner Civil Rights

ROSS JAY LAWSON
plaintiff

Ross Jay Lawson
[COR LD NTC] [PRO SE]
Broward County Jail
PO Box 9356
Fort Lauderdale, FL 33310

v.
BROWARD SHERIFF'S OFFICE,
Sheriff Ken Jenne
defendant

Robert Hunt Schwartz
FTS 760-9531
954-523-5885
[COR LD NTC]
Adorno & Zeder
888 SE 3rd Avenue
Suite 500
Fort Lauderdale, FL 33335-9002
954-523-5000
Robert Hunt Schwartz
See above
[COR LD NTC]

WILLIAM HITCHCOCK,
Superintendent BOCJ
defendant

PATRICK TIGBE, Director BOCJ
defendant

BROWARD COUNTY DEPARTMENT OF
CORRECTIONS
defendant

DOCKET PROCEEDINGS
